Mojave Desert Air Quality Management District
14306 Park Avenue, Victorville, CA 92392-2310
760.245.1661 • fax 760.245.2699
Visit our web site: http://www.mdaqmd.ca.gov
Brad Poiriez, Executive Director

February 12, 2018

Carol Sutkus
State of California
Environmental Protection Agency
Air Resources Board
P. O. Box 2815
Sacramento, California 95812

Project Title: Amendment of MDAQMD Rule 1115 – *Metal Parts & Products Coating Operations*

Dear Ms. Sutkus:

The Mojave Desert Air Quality Management District (MDAQMD) requests that the California Air Resources Board submit amended Rule 1115 – *Metal Parts & Products Coating Operations*, to the United States Environmental Protection Agency (USEPA) for inclusion in the State Implementation Plan (SIP).

The amendments to Rule 1115 – *Metal Parts & Products Coating Operations* are necessary to satisfy 42 U.S.C. §§7511a (FCAA §182) which requires that ozone non-attainment areas implement Reasonably Available Control Technology (RACT) for sources that are subject to Control Technology Guidelines (CTG) and for major sources of ozone precursors.

The District requests CARB submit amended Rule 1115 to replace the 1996 SIP version. While not specifically mentioned in the Direct Final Rule for the 04/22/1996 version of Rule 1115 (62 FR 67002, 12/23/1997), the District assumes that the approval action was for both the San Bernardino County portion of the MDAB and the Blythe/Palo Verde Valley portion of Riverside County, and that SCAQMD Rule 1107 – *Coating of Metal Parts and Products* was thereby removed from the SIP for the Blythe/Palo Verde Valley portion of Riverside County. (Please refer to Section (F) of the Staff Report for a complete SIP History and Analysis discussion).

If you have any questions regarding this submittal, please contact me at (760) 245-1661, extension 6726, or Tracy Walters at extension 6122. Please note that all documents required for a complete submission were sent electronically on February 12, 2018.

Sincerely,

Alan J. De Salvio
Deputy Director – Mojave Desert Operations

AJD/tw CARB SIP Submittal Request MD Rule 1115 021218

CALIFORNIA AIR RESOURCES BOARD

SIP COMPLETENESS CHECKLIST
(Electronic Format)

***** TO BE COMPLETED BY DISTRICT AND RETURNED TO ARB *****

All rules submitted to the EPA as State Implementation Plan (SIP) revisions must be supported by certain information and documentation for the rule packages to be deemed complete for review by the EPA. Rules will not be evaluated for approvability by the EPA unless the submittal packages are complete. To assist you in determining that all necessary materials are included in rules packages sent to the ARB for submittal to the EPA, please fill out the following form and include it with the rule package you send ARB. See the ARB's Guidelines on the Implementation of the 40 CFR 51, Appendix V, for a more detailed explanation than is provided here. Adopted rules and rule amendments should be checked against U.S. EPA's Guidance Document for Correcting Common VOC & Other Rule Deficiencies (Little Blue Book, August 21, 2001) to ensure that they contain no elements which will result in disapproval by EPA.

District: Mojave Desert Air Quality Management District

Rule No: 1115

Rule Title: Metal Parts & Products Coating Operations

Date Adopted or Amended: 01/22/2018

ADMINISTRATIVE MATERIALS

Note: All documents should be in electronic format. Items that have signatures, initials, or stamps may be scanned.

Attached	Not Attached	N/A	
☒	☐	☐	**COMPLETE COPY OF THE RULE:** Provide an unmarked copy of the entire rule as adopted or amended by your District Board.
☒	☐	☐	**UNDERLINE AND STRIKEOUT COPY OF THE RULE**: If an amended rule, provide a complete copy of the rule indicating in underline and strikeout format all language which has been added, deleted, or changed since the rule was last adopted or amended. ***(See Staff Report Appendix A)***
☐	☐	☒	**COMPLETE COPY OF THE REFERENCED RULE(S):** For any rule which includes language specifically referencing another rule, a copy of that other rule must also be submitted, unless it has already been submitted to EPA as part of a previous SIP submittal.
☒	☐	☐	**PUBLIC NOTICE EVIDENCE:** Include a copy of the local newspaper clipping certification(s), stating the date of publication, which must be at least 30 days before the hearing. As an alternative, include a copy of the actual published notice of the public hearing as it appeared in the local newspaper(s). In this case, however, enough of the newspaper page must be included to show the date of publication. The notice must specifically identify by title and number each rule adopted or amended. ***(See Staff Report Appendix B)***
☒	☐	☐	**RESOLUTION/MINUTE ORDER:** Provide the Board Clerk certified resolution or minute order. This document must include certification that the hearing was held in accordance with the information in the public notice. It must also list the rules that were adopted or amended, the date of the public hearing, and a statement of compliance with California Health and Safety Code Sections 40725-40728 (Administrative Procedures Act).
☒	☐	☐	**PUBLIC COMMENTS AND RESPONSES:** Submit copies of written public comments made during the notice period and at the public hearing. Also submit any written responses prepared by the District staff or presented to the District Board at the public hearing. A summary of the public comments and responses is adequate. If there were no comments made during the notice period or at the hearing, please indicate N/A to the left. ***(See Staff Report Appendix C)***

CALIFORNIA AIR RESOURCES BOARD

SIP COMPLETENESS CHECKLIST
(Electronic Format)

***** TO BE COMPLETED BY DISTRICT AND RETURNED TO ARB *****

☒ ☐ ☐ **RULE EVALUATION FORM:** See instructions for completing the Rule Evaluation Form and the accompanying sample form.

☐ ☐ ☒ **NON-EPA TEST METHODS:** Attach all test methods that are referenced in your rule that do not appear in 40 CFR 51, 60, 61, 63, or have not been previously submitted to EPA. EPA methods used in other media such as SW846 for solid waste are not automatically approved for air pollution applications. Submittal of test methods that are not EPA-approved should include the information and follow the procedure described in Region 9's "Test Method Review & Evaluation Process."

☐ ☐ ☒ **MODELING SUPPORT:** Provide if appropriate. In general, modeling support is not required for VOC and NOx rules to determine their impacts on ozone levels. Modeling is required where a rule is a relaxation that affects large sources (≥ 100 TPY) in an attainment area for SO2, directly emitted PM10, CO, or NOx (for NO2 purposes). In cases where EPA is concerned with the impact on air quality of rule revisions which relax limits or cause a shift in emission patterns in a nonattainment area, a reference back to the approved SIP will be sufficient provided the approved SIP accounts for the relaxation and provided the approved SIP used the current EPA modeling guidelines. If current EPA modeling guidelines were not used, then new modeling may be required.

☐ ☐ ☒ **ECONOMIC AND TECHNICAL JUSTIFICATION FOR DEVIATIONS FROM EPA POLICIES**: The District staff report or other information included with the submittal should discuss all potential relaxations or deviations from RACT, RACM, BACT, BACM, enforceability, attainment, RFP, or other relevant EPA requirements. This includes, for example, demonstrating that exemptions or emission limits less stringent than the presumptive RACT (e.g., a CTG) meet EPA's 5 percent policy, and demonstrating that all source categories exempted from a RACM/BACM rule are de minimus according to EPA's RACM/BACM policy. ***(See Staff Report)***

☒ ☐ ☐ **ADDITIONAL MATERIALS**: Provide District staff reports and any other supporting information concerning development of the rule or rule changes. This information should explain the basis for all limits and thresholds contained in the rule.

CALIFORNIA AIR RESOURCES BOARD

APCD/AQMD RULE EVALUATION FORM – Page 1
(Electronic Format)

I. GENERAL INFORMATION

District: Mojave Desert Air Quality Management District

Rule No(s): 1115 Date adopted/Amended/Rescinded: January 22, 2018

Rule Title(s): Metal Parts & Products Coating Operations

Date Submitted to ARB: February 12, 2018

If an Amended Rule, Date Last Amended (or Adopted): April 22, 1996

Is the Rule Intended to be Sent to the U.S. EPA as a SIP Revision? ☒ Yes ☐ No *(If No, do not complete remainder of form)*

District Contact: Tracy Walters Phone Number: (760) 245-1661 x6122 E-mail Address: twalters@mdaqmd.ca.gov

Narrative Summary of New Rule or Rule Changes: ☐ New Rule ☒ Amended Rule

The amendments to Rule 1115 satisfy 42 U.S.C. §§7511a (FCAA §182) which requires that ozone non-attainment areas implement RACT for sources that are subject to CTGs and for major sources of ozone precursors. While the District does not have sources meeting the threshold in the CTGs it does have major facilities which coat metal parts and products and thus a rule is required. Additionally, the District is amending this rule to satisfy a prior commitment to implement the provisions of H&S Code §39614(d) (expired by its own terms on January 1, 2011) which required the adoption of readily available, feasible and cost-effective control measures for Particulate Matter from a list of potential local control measures promulgated by CARB. The proposed amendments update rule definitions; transfer efficiency requirements; coating limits; control device efficiency; work practices; VOC content for strippers and surface preparation materials; test methods; and, record retention requirements. .

Pollutant(s) Regulated by the Rule (Check): ☒ ROG ☐ (NOx) ☐ SO2 ☐ (CO) ☐ PM ☐ TAC (name):_____

II. EFFECT ON EMISSIONS

Complete this section ONLY for rules that, when implemented, will result in quantifiable changes in emissions. Attach reference(s) for emission factor(s) and other information. Attach calculation sheet showing how the emission information provided below was determined.

Net Effect on Emissions: ☐ Increase ☐ Decrease ☒ N/A

Emission Reduction Commitment in SIP for this Source Category: N/A

Inventory Year Used to Calculate Changes in Emissions: N/A Area Affected: N/A

Future Year Control Profile Estimate *(Provide information on as many years as possible)*:
N/A

APCD/AQMD RULE EVALUATION FORM - Page 2
(Electronic Format)

Baseline Inventory in the SIP for the Control Measure: N/A

Emissions Reduction Commitment in the SIP for the Control Measure: N/A

Revised Baseline Inventory (if any): N/A

Revised Emission Reduction Estimate (if developed): N/A

Note that the district's input to the Rule Evaluation Form will not be used as input to the ARB's emission forecasting and planning.

III. SOURCES/ATTAINMENT STATUS

District is: ☐ Attainment ☐ Nonattainment ☒ Split

Approximate Total Number of Small (<100 TPY) Sources Affected by this Amendment: 5

Percent in Nonattainment Area: 100%

Number of Large (≥ 100 TPY) Sources Controlled: 0 Percent in Nonattainment Area: 0%

Name(s) and Location(s) (city and county) of Large (≥ 100 TPY) Sources Controlled by Rule *(Attach additional sheets as necessary)*: N/A

IV. EMISSION REDUCTION TECHNOLOGY

Does the Rule Include Emission Limits that are Continuous? ☐ Yes ☒ No

If Yes, Those Limits are in Section(s) N/A of the Rule.

Other Methods in the Rule for Achieving Emission Reductions are: Control device efficiency, work practices, surface preparation and cleanup solvent VOC limits.

V. OTHER REQUIREMENTS

The Rule Contains:

Emission Limits in Section(s): C Work Practice Standards in Section(s): C
Recordkeeping Requirements in Section(s): F Reporting Requirements in Section(s): F

APCD/AQMD RULE EVALUATION FORM - Page 3
(Electronic Format)

VI. IMPACT ON AIR QUALITY PLAN

☒ No Impact ☐ Impacts RFP ☐ Impacts attainment

Discussion: The proposed amendments update rule definitions; transfer efficiency requirements; coating limits; control device efficiency; work practices; VOC content for strippers and surface preparation materials; test methods; and, record retention requirements. A requirement for prohibition of sale has been reinserted in the rule as suggested in the August 1997 Technical Support Document for EPA's Notice of Direct Final Rulemaking for Rule 1115 (62 FR 67002, 12/23/1997). The rule amendments are more stringent than the previous rule version. There is no potential that the amendments might cause the release of additional air contaminants or create any adverse environmental impacts.

RESOLUTION 18-05

A RESOLUTION OF THE GOVERNING BOARD OF THE MOJAVE DESERT AIR QUALITY MANAGEMENT DISTRICT MAKING FINDINGS, CERTIFYING THE NOTICE OF EXEMPTION, AMENDING RULE 1115 - METAL PARTS & PRODUCTS COATING OPERATIONS AND DIRECTING STAFF ACTIONS.

On January 22, 2018, on motion by Member **ROBERT LEONE**, seconded by Member **ROBERT LOVINGOOD**, and carried, the following resolution is adopted:

WHEREAS, the Mojave Desert Air Quality Management District (MDAQMD) has authority pursuant to California Health and Safety Code (H&S Code) §§40702, 40725-40728 to adopt, amend or repeal rules and regulations; and

WHEREAS, the Federal Clean Air Act (FCAA) requires areas designated non-attainment and classified moderate and above to implement Reasonably Available Control Technology (RACT) for sources subject to Control Techniques Guidelines (CTG) documents issued by United States Environmental Protection Agency (USEPA) and for "major sources" of Volatile Organic Compounds (VOCs) and oxides of nitrogen (NO_X) which are ozone precursors; and

WHEREAS, the District adopted the *2015 8-Hour Reasonably Available Control Technology – State Implementation Plan Analysis (RACT SIP Analysis)* in February, 2015 which committed to amending Rule 1115 – *Metal Parts & Products Coating Operations* to current Federal RACT; and

WHEREAS, the MDAQMD has a metal parts and products coating operations rule which was amended April 22, 1996 and approved as RACT into the SIP in 1997 (62 FR 67002, 12/23/1997); and

WHEREAS, this rule is subject to the CTG titled *Control Techniques Guidelines for Miscellaneous Metal and Plastic Parts Coatings* (EPA-453/R-08-003, September 2008), the CTG titled *Control of Volatile Organic Emissions From Existing Stationary Sources Volume VI: Surface Coating of Miscellaneous Metal Parts and Products* (EPA-450/2-78-015, June 1978), and the CTG titled *Control Techniques Guidelines: Industrial Cleaning Solvents* (EPA 453/R-06-001, September 2006); and

WHEREAS, there are also two metal coating CTGs titled *Control Techniques Guidelines for Large Appliance Coatings* (EPA 453/R-07-004, September 2007) and *Control Techniques Guidelines for Metal Furniture Coatings (EPA 453/R-07-005, September 2007)* for which the District has filed Federal Negative Declarations (February 23, 2015); and

//

WHEREAS, the District has several facilities that primarily coat metal parts and products and some additional facilities that coat metal parts and products as part of their operations; and

WHEREAS, there are no facilities that meet the specific applicability threshold of the *CTG for Miscellaneous Metal and Plastic Parts*, but there are major facilities that coat metal parts and products; and

WHEREAS, the provisions of Health & Safety Code (H&S Code) §39614(d) required the adoption of certain control measures for Particulate Matter (PM) from a list promulgated by the California Air Resources Board (CARB) contained in the *Proposed List of Measures to Reduce Particulate Matter – PM10 and PM2.5 (Implementation of Senate Bill 656, Sher 2003)*; and

WHEREAS, former H&S Code §39614(d) (expired by its own terms on January 1, 2011) required the adoption of the most readily available, feasible and cost-effective local control measures for PM as contained on a list developed by CARB; and

WHEREAS, furthermore, this list required the adoption of Reasonably Available Control Measures (RACM) for PM; and

WHEREAS, the proposed amendments to Rule 1115 address the *RACT SIP Analysis* and former H&S Code §39614(d) commitments; and

WHEREAS, the proposed amendments are necessary to satisfy 42 U.S.C. §§7511a FCAA §182) which requires that ozone non-attainment areas implement RACT for sources that are subject to a CTG, and for major sources of ozone precursors and major facilities which coat metal parts and products; and

WHEREAS, the proposed amendments to this rule are also necessary to satisfy the prior commitment to implement the provisions of former H&S Code §39614(d) as adopted in the *MDAQMD List and Implementation Schedule for District Measures to Reduce PM pursuant to Health and Safety Code §39614(d)*; and

WHEREAS, the proposed amendments are clear in that the meaning can be easily understood by the persons impacted by the rule; and

WHEREAS, the proposed amendments to Rule 1115 are in harmony with, and not in conflict with or contradictory to any state law or regulation, federal law or regulation, or court decisions; the proposed rule is consistent with the CTG provisions, and when analyzed, the provisions of Rule 1115

were determined to be readily available, feasible and cost-effective for PM control measures promulgated by CARB; and

WHEREAS, the proposed amendments to Rule 1115 do not impose the same requirements as any existing state or federal law because CTGs and the CARB *Proposed List of Measures to Reduce Particulate Matter – PM10 and PM2.5 (Implementation of Senate Bill 656, Sher 2003)* (former H&S Code §39614(d)) are primarily guidance documents and not enforceable in and of themselves, therefore a rule is necessary to implement the applicable provisions of these documents; and

WHEREAS, a public hearing has been properly noticed and conducted, pursuant to H&S Code §40725, concerning the proposed amendments to Rule 1115; and

WHEREAS, this item was continued to the January 22, 2018 Governing Board meeting to address industry comments; and

WHEREAS, a Notice of Exemption, a Categorical Exemption (Class 8, 14 CCR §15308) for the proposed amendments to Rule 1115, completed in compliance with the California Environmental Quality Act (CEQA), has been presented to the MDAQMD Board; each member having reviewed, considered and approved the information contained therein prior to acting on the proposed amendments to Rule 1115, and the MDAQMD Board having determined that the proposed amendments will not have any potential for resulting in any adverse impact upon the environment; and

WHEREAS, the Governing Board of the MDAQMD has considered the evidence presented at the public hearing; and

NOW, THEREFORE, BE IT RESOLVED, that the Governing Board of the MDAQMD finds that the proposed amendments to Rule 1115 – *Metal Parts & Products Coating Operations* are necessary, authorized, clear, consistent, non-duplicative and properly referenced; and

BE IT FURTHER RESOLVED, that the Governing Board of the MDAQMD hereby makes a finding that the Class 8 Categorical Exemption (14 CCR §15308) applies and certifies the Notice of Exemption for the proposed amendments to Rule 1115; and

BE IT FURTHER RESOLVED, that the Governing Board of the MDAQMD does hereby adopt, pursuant to the authority granted by law, the proposed amendments to Rule 1115, as set forth in the attachments to this resolution and incorporated herein by this reference; and

BE IT FURTHER RESOLVED, that this resolution shall take effect immediately upon adoption, that the Executive Office Manager is directed to file the Notice of Exemption in compliance with the provisions of CEQA.

PASSED, APPROVED AND ADOPTED by the Governing Board of the Mojave Desert Air Quality Management District by the following vote:

AYES:	12	MEMBER:	CAMARGO, COLE, COX, DECONINCK, HERNANDEZ, LEONE, LOVINGOOD, PEREZ, RAMOS, RIORDAN, SWANSON, WILLIAMS
NOES:		MEMBER:	
ABSENT:	1	MEMBER:	STANTON
ABSTAIN:		MEMBER:	

STATE OF CALIFORNIA)
) SS:
COUNTY OF SAN BERNARDINO)

I, Deanna Hernandez, Senior Executive Analyst of the Mojave Desert Air Quality Management District, hereby certify the foregoing to be a full, true and correct copy of the record of the action as the same appears in the Official Minutes of said Governing Board at its meeting of January 22, 2018.

Senior Executive Analyst,
Mojave Desert Air Quality Management District.

MINUTES OF THE GOVERNING BOARD
OF THE MOJAVE DESERT AIR QUALITY MANAGEMENT DISTRICT
VICTORVILLE, CALIFORNIA

AGENDA ITEM #21

DATE: January 22, 2018

RECOMMENDATION: Conduct a continued public hearing to consider the amendment of Rule 1115 - *Metal Parts & Products Coating Operations*: a. Open public hearing; b. Receive staff report; c. Receive public testimony; d. Close public hearing; e. Make a determination that the California Environmental Quality Act (CEQA) Categorical Exemption applies; f. Waive reading of Resolution; g. Adopt Resolution making appropriate findings, certifying the Notice of Exemption, amending Rule 1115 and directing staff actions.

SUMMARY: Rule 1115 is proposed for amendment to satisfy 42 U.S.C. §§7511a (Federal Clean Air Act (FCAA) §182) which requires that ozone non-attainment areas implement Reasonably Available Control Technology (RACT) for sources that are subject to Control Techniques Guidelines (CTG) and for major sources of ozone precursors. Additionally, the District is amending this rule to satisfy a prior commitment to implement the provisions of H&S Code §39614(d) (expired by its own terms on January 1, 2011) which required the adoption of readily available, feasible and cost-effective control measures for Particulate Matter from a list of potential local control measures promulgated by the California Air Resources Board (CARB). The amendment of Rule 1115 was continued to address substantive industry comments to clarify rule implementation.

CONFLICT OF INTEREST: None

BACKGROUND: The Federal Clean Air Act (FCAA) requires areas designated non-attainment and classified moderate and above to implement Reasonably Available Control Technology (RACT) for sources subject to Control Techniques Guidelines (CTG) documents issued by United States Environmental Protection Agency (USEPA) for "major sources" of Volatile Organic Compounds (VOCs) and oxides of nitrogen (NO_X) which are ozone precursors. The District adopted the *2015 8-Hour Reasonably Available Control Technology – State Implementation Plan Analysis (RACT SIP Analysis)* in February, 2015 which committed to amending Rule 1115 – *Metal Parts & Products Coating Operations* to current Federal RACT. The MDAQMD has a metal parts and products coating operations rule which was amended April 22, 1996 and approved as RACT into the SIP in 1997 (62 FR 67002, 12/23/1997). This rule is subject

I, Donna Hernandez
CUSTODIAN OF RECORDS OF MOJAVE DESERT AIR QUALITY MANAGEMENT DISTRICT, HEREBY CERTIFY THE FOREGOING TO BE A FULL, TRUE AND CORRECT COPY OF THE RECORD OF THE ACTION AS THE SAME APPEARS IN THE OFFICIAL MINUTES OF SAID GOVERNING BOARD MEETING

MOJAVE DESERT AIR QUALITY MANAGEMENT DISTRICT.

to the CTG titled *Control Techniques Guidelines for Miscellaneous Metal and Plastic Parts Coatings* (EPA-453/R-08-003, September 2008), the CTG titled *Control of Volatile Organic Emissions From Existing Stationary Sources Volume VI: Surface Coating of Miscellaneous Metal Parts and Products* (EPA-450/2-78-015, June 1978), and the CTG titled *Control Techniques Guidelines: Industrial Cleaning Solvents* (EPA 453/R-06-001, September 2006). There are also two metal coating CTGs titled *Control Techniques Guidelines for Large Appliance Coatings* (EPA 453/R-07-004, September 2007) and *Control Techniques Guidelines for Metal Furniture Coatings (EPA 453/R-07-005, September 2007)* for which the District has filed Federal Negative Declarations (February 23, 2015).

The District has several facilities that primarily coat metal parts and products and some additional facilities that coat metal parts and products as part of their operations. There are no facilities that meet the specific applicability threshold of the *CTG for Miscellaneous Metal and Plastic Parts*, but there are major facilities that coat metal parts and products. The MDAQMD is proposing to update Rule 1115 – *Miscellaneous Metal Parts & Products Coating Operations* to reflect current federal RACT.

Additionally the provisions of Health & Safety Code (H&S Code) §39614(d) required the adoption of certain control measures for Particulate Matter (PM) from a list promulgated by CARB. Former H&S Code §39614(d) (expired by its own terms on January 1, 2011) required the adoption of the most readily available, feasible and cost-effective local control measures for PM as contained on a list developed by CARB. Furthermore, this list required the adoption of Reasonably Available Control Measures (RACM) for PM. The proposed amendments to Rule 1115 satisfy both of these requirements.

The proposed amendments to Rule 1115 address the *RACT SIP Analysis* and H&S Code §39614(d) commitments. The proposed amendments update rule definitions; transfer efficiency requirements; coating limits; control device efficiency; work practices; VOC content for strippers and surface preparation materials; test methods; and, record retention requirements. A prohibition of sale requirement has been reinserted in the rule as suggested in the August 1997 Technical Support Document for EPA's Notice of Direct Final Rulemaking for Rule 1115 (62 FR 67002, 12/23/1997). The proposed amendments are based on the CTGs, and various other district rules deemed as fulfilling RACT requirements, including but not limited to: South Coast Air Quality Management District Rule 1107 – *Coating of Metal Parts and Products*, amended 01/06/2006 (73 FR 70883, 11/24/2008); Placer County Air Pollution Control District Rule 245 – *Surface Coating of Metal Parts and Products*, amended 08/20/2009 (76 FR 30025, 5/24/2011); and, San Joaquin Valley Unified Air Pollution Control District Rule 4603 – *Surface Coating of Metal Parts and Products, Plastic Parts and Products, and Pleasure Crafts*, amended 09/17/2009 (76 FR 67369, 11/01/2011).

A Notice of Exemption, Categorical Exemption (Class8; 14 Cal. Code Reg. §15308) will be prepared by the MDAQMD for the amendment of Rule 1115 pursuant to the requirements of CEQA.

REASON FOR RECOMMENDATION: Health & Safety Code §§40702 and 40703 require the Governing Board to hold a public hearing before adopting rules and regulation. Also, 42 U.S.C. §7410(l) (FCAA §110(l)) requires that all SIP revisions be adopted after public notice and hearing.

REVIEW BY OTHERS: This item was reviewed by Karen Nowak, District Counsel as to legal form and by Alan De Salvio, Deputy Director – Mojave Desert Operations on or about January 8, 2018.

FINANCIAL DATA: No increase in appropriation is anticipated.

PRESENTER: Alan De Salvio, Deputy Director – Mojave Desert Operations

ACTION OF THE GOVERNING BOARD

ADOPTED

Upon Motion by **ROBERT LEONE,** Seconded by **ROBERT LOVINGOOD,** as approved by the following roll call vote:

Ayes:	*12*	**CAMARGO, COLE, COX, DECONINCK, HERNANDEZ, LEONE, LOVINGOOD, PEREZ, RAMOS, RIORDAN, SWANSON WILLIAMS**
Noes:		
Absent:	*1*	**STANTON**
Abstain:		
Vacant:		

DEANNA HERNANDEZ, SENIOR EXECUTIVE ANALYST
BY _____
Dated: JANUARY 22, 2018

Ref. Resolution 18-05, "A RESOLUTION OF THE GOVERNING BOARD OF THE MOJAVE DESERT AIR QUALITY MANAGEMENT DISTRICT MAKING FINDINGS, CERTIFYING THE NOTICE OF EXEMPTION, AMENDING RULE 1115 – *METAL PARTS & PRODUCTS COATING OPERATIONS* AND DIRECTING STAFF ACTIONS."

MINUTES OF THE GOVERNING BOARD
OF THE MOJAVE DESERT AIR QUALITY MANAGEMENT DISTRICT
VICTORVILLE, CALIFORNIA

AGENDA ITEM #16

DATE: October 23, 2017

RECOMMENDATION: Conduct a public hearing to consider the amendment of Rule 1115 - *Metal Parts & Products Coating Operations* and continue public hearing to January 22, 2018.

SUMMARY: Rule 1115 is proposed for amendment to satisfy 42 U.S.C. §§7511a (Federal Clean Air Act (FCAA) §182) which requires that ozone non-attainment areas implement Reasonably Available Control Technology (RACT) for sources that are subject to Control Techniques Guidelines (CTG) and for major sources of ozone precursors. Additionally, the District is amending this rule to satisfy a prior commitment to implement the provisions of H&S Code §39614(d) (expired by its own terms on January 1, 2011) which required the adoption of readily available, feasible and cost-effective control measures for Particulate Matter from a list of potential local control measures promulgated by the California Air Resources Board (CARB). Continuation is requested due to receipt of substantial comment regarding Rule enforcement from industry.

CONFLICT OF INTEREST: None

BACKGROUND: The Federal Clean Air Act (FCAA) requires areas designated non-attainment and classified moderate and above to implement Reasonably Available Control Technology (RACT) for sources subject to Control Techniques Guidelines (CTG) documents issued by United States Environmental Protection Agency (USEPA) for "major sources" of Volatile Organic Compounds (VOCs) and oxides of nitrogen (NO_X) which are ozone precursors. The District adopted the *2015 8-Hour Reasonably Available Control Technology – State Implementation Plan Analysis (RACT SIP Analysis)* in February, 2015 which committed to amending Rule 1115 – *Metal Parts & Products Coating Operations* to current Federal RACT. The MDAQMD has a metal parts and products coating operations rule which was amended April 22, 1996 and approved as RACT into the SIP in 1997 (62 FR 67002, 12/23/1997). This rule is subject to the CTG titled *Control Techniques Guidelines for Miscellaneous Metal and Plastic Parts Coatings* (EPA-453/R-08-003, September 2008), the CTG titled *Control of Volatile*

I, Deanna Hernandez
CUSTODIAN OF RECORDS OF MOJAVE DESERT AIR QUALITY MANAGEMENT DISTRICT, HEREBY CERTIFY THE FOREGOING TO BE A FULL, TRUE AND CORRECT COPY OF THE RECORD OF THE ACTION AS THE SAME APPEARS IN THE OFFICIAL MINUTES OF SAID GOVERNING BOARD MEETING

MOJAVE DESERT AIR QUALITY MANAGEMENT DISTRICT.

Organic Emissions From Existing Stationary Sources Volume VI: Surface Coating of Miscellaneous Metal Parts and Products (EPA-450/2-78-015, June 1978), and the CTG titled *Control Techniques Guidelines: Industrial Cleaning Solvents* (EPA 453/R-06-001, September 2006). There are also two metal coating CTGs titled *Control Techniques Guidelines for Large Appliance Coatings* (EPA 453/R-07-004, September 2007) and *Control Techniques Guidelines for Metal Furniture Coatings (EPA 453/R-07-005, September 2007)* for which the District has file Federal Negative Declarations (February 23, 2015).

Additionally the provisions of Health & Safety Code (H&S Code) §39614(d) required the adoption of certain control measures for Particulate Matter (PM) from a list promulgated by CARB. Former H&S Code §39614(d) (expired by its own terms on January 1, 2011) required the adoption of the most readily available, feasible and cost-effective local control measures for PM as contained on a list developed by CARB. Furthermore, this list required the adoption of Reasonably Available Control Measures (RACM) for PM. The proposed amendments to Rule 1115 satisfy both of these requirements.

The District has several facilities that primarily coat metal parts and products and some additional facilities that coat metal parts and products as part of their operations. There are no facilities that meet the specific applicability threshold of the *CTG for Miscellaneous Metal and Plastic Parts*, but there are major facilities that coat metal parts and products. The MDAQMD is proposing to update Rule 1115 – *Miscellaneous Metal Parts & Products Coating Operations* to reflect current federal RACT.

The proposed amendments to Rule 1115 address the *RACT SIP Analysis* and H&S Code §39614(d) commitments. The proposed amendments update rule definitions; transfer efficiency requirements; coating limits; control device efficiency; work practices; VOC content for strippers and surface preparation materials; test methods; and, record retention requirements. A prohibition of sale requirement has been reinserted in the rule as suggested in the August 1997 Technical Support Document for EPA's Notice of Direct Final Rulemaking for Rule 1115 (62 FR 67002, 12/23/1997). The proposed amendments are based on the CTGs, and various other district rules deemed as fulfilling RACT requirements, including but not limited to: South Coast Air Quality Management District Rule 1107 – *Coating of Metal Parts and Products*, amended 01/06/2006 (73 FR 70883, 11/24/2008); Placer County Air Pollution Control District Rule 245 – *Surface Coating of Metal Parts and Products*, amended 08/20/2009 (76 FR 30025, 5/24/2011); and, San Joaquin Valley Unified Air Pollution Control District Rule 4603 – *Surface Coating of Metal Parts and Products, Plastic Parts and Products, and Pleasure Crafts*, amended 09/17/2009 (76 FR 67369, 11/01/2011).

A Notice of Exemption, Categorical Exemption (Class8; 14 Cal. Code Reg. §15308) will be prepared by the MDAQMD for the amendment of Rule 1115 pursuant to the requirements of CEQA.

REASON FOR RECOMMENDATION: Health & Safety Code §§40702 and 40703 require the Governing Board to hold a public hearing before adopting rules and regulation. Also, 42 U.S.C. §7410(l) (FCAA §110(l)) requires that all SIP revisions be adopted after public notice and hearing.

REVIEW BY OTHERS: This item was reviewed by Karen Nowak, District Counsel as to legal form and by Alan De Salvio, Deputy Director – Mojave Desert Operations on or about October 9, 2017.

FINANCIAL DATA: No increase in appropriation is anticipated.

PRESENTER: Alan De Salvio, Deputy Director – Mojave Desert Operations

CONCENSUS ACTION OF THE GOVERNING BOARD

OPEN PUBLIC HEARING AND

CONTINUED PUBLIC HEARING TO GOVERNING BOARD MEETING OF

JANUARY 22, 2018.

MINUTES OF THE GOVERNING BOARD
OF THE MOJAVE DESERT AIR QUALITY MANAGEMENT DISTRICT
VICTORVILLE, CALIFORNIA

AGENDA ITEM #11

DATE: September 25, 2017

RECOMMENDATION: Set date of October 23, 2017 to conduct a public hearing to consider the amendment of Rule 1115 – *Metal Parts & Products Coating Operations* and approval of California Environmental Quality Act (CEQA) documentation.

SUMMARY: This item officially sets the date for the mandatory public hearing to be held on the amendment of Rule 1115. Rule 1115 is proposed for amendment to satisfy 42 U.S.C. §§7511a (Federal Clean Air Act (FCAA) §182) which requires that ozone non-attainment areas implement Reasonably Available Control Technology (RACT) for sources that are subject to Control Techniques Guidelines (CTG) and for major sources of ozone precursors.

CONFLICT OF INTEREST: None

BACKGROUND: The FCAA requires areas designated non-attainment and classified moderate and above to implement RACT for sources subject to CTG documents issued by United States Environmental Protection Agency (USEPA) for "major sources" of volatile organic compounds (VOCs) and oxides of nitrogen (NO_X) which are ozone precursors. The District adopted the *2015 8-Hour Reasonably Available Control Technology – State Implementation Plan Analysis (RACT SIP Analysis)* in February, 2015 which committed to amending Rule 1115 – *Metal Parts & Products Coating Operations* to current Federal RACT. The MDAQMD has a metal parts and products coating operations rule which was amended April 22, 1996 and approved as RACT into the SIP in 1997 (62 FR 67002, 12/23/1997). This rule is subject to the CTG titled *Control Techniques Guidelines for Miscellaneous Metal and Plastic Parts Coatings* (EPA-453/R-08-003, September 2008), the CTG titled *Control of Volatile Organic Emissions From Existing Stationary Sources Volume VI: Surface Coating of Miscellaneous Metal Parts and Products* (EPA-450/2-78-015, June 1978), and the CTG titled *Control Techniques Guidelines: Industrial Cleaning Solvents* (EPA 453/R-06-001, September 2006). There are also two metal coating CTGs titled *Control Techniques Guidelines for Large Appliance Coatings* (EPA 453/R-07-004, September 2007) and *Control Techniques Guidelines for Metal Furniture Coatings (EPA 453/R-07-005, September 2007)* for which the District has filed Federal Negative Declarations (February 23, 2015).

I, Donna Hernandez
CUSTODIAN OF RECORDS OF MOJAVE DESERT AIR QUALITY MANAGEMENT DISTRICT, HEREBY CERTIFY THE FOREGOING TO BE A FULL, TRUE AND CORRECT COPY OF THE RECORD OF THE ACTION AS THE SAME APPEARS IN THE OFFICIAL MINUTES OF SAID GOVERNING BOARD MEETING

MOJAVE DESERT AIR QUALITY MANAGEMENT DISTRICT.

The District has several facilities that primarily coat metal parts and products, and additional facilities that coat metal parts and products as part of their operations. There are no facilities that meet the specific applicability threshold of the *CTG for Miscellaneous Metal and Plastic Parts*, but there are major facilities that coat metal parts and products. The MDAQMD is now proposing to update Rule 1115 – *Metal Parts & Products Coating Operations* to reflect current federal RACT.

The proposed amendments to Rule 1115 address the *RACT SIP Analysis* commitments. The proposed amendments update rule definitions, transfer efficiency requirements, coating limits, control device efficiency, work practices, VOC content for strippers and surface preparation materials, test methods, and record retention requirements. A requirement for prohibition of sale has been reinserted in the rule as suggested in the August 1997 Technical Support Document for EPA's Notice of Direct Final Rulemaking for Rule 1115 (62 FR 67002, 12/23/1997). The proposed amendments are based on the CTGs, and various district rules deemed as fulfilling RACT requirements, including but not limited to: South Coast Air Quality Management District Rule 1107 – *Coating of Metal Parts and Products*, amended 01/06/2006 (73 FR 70883, 11/24/2008); Placer County Air Pollution Control District Rule 245 – *Surface Coating of Metal Parts and Products*, amended 08/20/2009 (76 FR 30025, 5/24/2011); and, San Joaquin Valley Unified Air Pollution Control District Rule 4603 – *Surface Coating of Metal Parts and Products, Plastic Parts and Products, and Pleasure Crafts*, amended 09/17/2009 (76 FR 67369, 11/01/2011).

A Notice of Exemption, Categorical Exemption (Class 8; 14 Cal. Code Reg. §15308) will be prepared by the MDAQMD for the amendment of Rule 1115 pursuant to the requirements of CEQA.

REASON FOR RECOMMENDATION: Health & Safety Code §§40702 and 40703 require the Governing Board to hold a public hearing before adopting rules and regulation. Also, 42 U.S.C. §7410(l) (FCAA §110(l)) requires that all SIP revisions be adopted after public notice and hearing.

REVIEW BY OTHERS: This item was reviewed by Karen Nowak, District Counsel as to legal form and by Alan De Salvio, Deputy Director – Mojave Desert Operations on or before September 11, 2017.

FINANCIAL DATA: No increase in appropriation is anticipated.

PRESENTER: Alan De Salvio, Deputy Director – Mojave Desert Operations

ACTION OF THE GOVERNING BOARD

APPROVED (SET DATE)

Upon Motion by **BARB STANTON,** Seconded by **JOHN COLE,** as approved by the following roll call vote:

Ayes:	***10***	**CAMARGO, COLE, COX, DECONINCK, HERNANDEZ, LEONE, LOVINGOOD, RIORDAN, STANTON, WILLIAMS**
Noes:		
Absent:	***3***	**PEREZ, RAMOS, RUSS**
Abstain:		
Vacant:		

DEANNA HERNANDEZ, EXECUTIVE OFFICE MANAGER
BY _____
Dated: SEPTEMBER 25, 2017

MOJAVE DESERT AIR QUALITY MANAGEMENT DISTRICT
GOVERNING BOARD

******NOTICE OF CANCELLATION OF REGULAR MEETING******
****OF NOVEMBER 27, 2017 & DECEMBER 25, 2017****

NOTICE IS HEREBY GIVEN that the Regular Meeting of the Governing Board of the Mojave Desert Air Quality Management District (District) scheduled for Monday, November 27, 2017 at 10:00 a.m. and Monday, December 25, 2017 has been cancelled.

NOTICE IS ALSO HEREBY GIVEN that the date of the next regular meeting of the Governing Board is scheduled for Monday, January 22, 2018 at 10:00 a.m.

SAID MEETING will be conducted in the Mojave Desert Air Quality Management District Board Chambers, 14306 Park Avenue, Victorville, CA 92392-2310. Interested persons may attend and submit oral and/or written comments/statements at the meeting. It is requested that written comments/statements be submitted to the Victorville location prior to the meeting.

A copy of the Agenda will be duly posted in the main lobby of the District's Headquarter located at 14306 Park Avenue, Victorville, CA for viewing.

MOJAVE DESERT AIR QUALITY MANAGEMENT DISTRICT
GOVERNING BOARD

DEANNA HERNANDEZ
EXECUTIVE OFFICE MANAGER
PHONE: (760) 245-1661 EXT. 6244

MAILED AND POSTED: Thursday, November 9, 2017
DATE

RULE 1115
Metal Parts & Products Coating Operations

(A) General

(1) Purpose

(a) The purpose of this Rule is to limit the emission of Volatile Organic Compounds from the coating of Metal Parts and Products.

(2) Applicability

(a) This Rule shall apply to all metal coating operations, except those performed on Aircraft or Aerospace Vehicles; Magnet Wire; Metal Containers, Closures and Coils; marine vessel exteriors; Motor Vehicles; Motor Vehicle Assembly Lines; Mobile Equipment; or those operations subject to the coating provisions of any other source-specific rule of the District.

(b) Any Coating, coating operation or Facility which is exempt from all or a portion of the VOC limits of this Rule shall comply with the provisions of Rule 442.

(B) Definitions

The definitions contained in District Rule 102 – *Definition of Terms* shall apply unless the term is otherwise defined herein:

(1) "Adhesive" – Any substance that is used to bond surfaces together by adhesion.

(2) "Aerosol Coating Product" – A pressurized Coating product containing pigments or resins that dispenses product ingredients by means of a propellant, and is packaged in a disposable can for hand-held application, or for use in specialized Equipment for ground traffic/marking applications.

(3) "Aircraft or Aerospace Vehicle" – Any fabricated part, assembly of parts or completed unit of any aircraft, helicopter, missile or space vehicle.

(4) "Assembly Line" – An arrangement of industrial Equipment and workers in which the product passes from one specialized operation to another until complete, either by automatic or manual means.

(5) "Camouflage Coating" – A Coating used, principally by the military, to conceal Equipment from detection.

(6) "Chemical Agent Resistant Coating" (CARC) – A Coating applied to military tactical Equipment in order to protect the Equipment from chemical warfare agents.

(7) "Clear Coating" – A Coating that either lacks color and opacity, or is transparent, and uses the surface to which it is applied as a reflective base or undertone color.

(8) "Closure" – Any component which is used to close or seal a filled can, jar or bottle.

(9) "Coil" – Any flat metal sheet or strip that is rolled or wound in concentric rings.

(10) "Combined Efficiency" – The capture efficiency multiplied by the Control Equipment efficiency, expressed as an overall weight percent.

(11) "Contract Painter" – A non-manufacturer of Metal Parts and Products who applies Coatings to such products at his Facility exclusively under contract with one or more parties that operate under separate ownership and control.

(12) "Drum" – Any cylindrical metal shipping container of 13 to 110 gallon capacity.

(13) "Electric-Insulating and Thermal-Conducting Coating" – A Coating that displays an electrical insulation of at least 1000 volts DC per mil on a flat test plate and an average thermal conductivity of at least 0.27 BTU per hour-foot-degree-Fahrenheit.

(14) "Electric-Insulating Varnish" – A non-convertible-type Coating applied to electrical motors, components of electrical motors, or power transformers, to provide electrical, mechanical, and environmental protection or resistance.

(15) "Electrocoating (Electrodeposition)" – A process that uses Coating concentrates or pastes added to a water bath. The Coating is applied using either an electric current in either an anodic or cathodic bath.

(16) "Electrostatic Spray" – A Coating application method accomplished by charging atomized paint particles for deposition by electrostatic attraction on a metal part or product.

(17) "Etching Filler" – A Coating that contains less than 23 percent solids by weight and at least 1/2 percent acid by weight, and is used instead of applying a pretreatment Coating followed by a primer.

(18) "Extreme High-Gloss Coating" – A Coating which, when tested by the American Society for Testing Material (ASTM) Method D-523-1980, shows a reflectance of 75 percent or more on a 60º meter.

(19) "Extreme-Performance Coating" – A Coating used on a metal surface where the coated surface is, in its intended use, exposed to any of the following:

(a) Repeated heavy abrasion, including mechanical wear and repeated scrubbing with industrial-grade Solvents, detergents, cleaners, or abrasive scouring agents;

(b) Frequent or chronic exposure to salt water, corrosives, caustics, acids, oxidizing agents, chemicals, chemical fumes, chemical mixtures or solutions;

(c) Repeated exposure to temperatures in excess of 250 ºF.

Extreme performance Coatings include, but are not limited to, Coatings applied to locomotives, railroad cars, farm machinery, and heavy duty trucks.

(20) "Hand Application Methods" – The application of Coatings by manually held, non-mechanically operated Equipment. Such Equipment includes paint brushes, hand rollers, caulking guns, trowels, spatulas, syringe daubers, rags and sponges.

(21) "Heat-Resistant Coating" – A Coating that must withstand a temperature of at least 400 °F (204°C) during normal use.

(22) "High-Gloss Coating" – A Coating which, when tested in accordance with ASTM Method D-523-89, shows a reflectance of 85 percent or more on a 60° meter.

(23) "High-Performance Architectural Coating" – A Coating used to protect architectural subsections and which meets the requirements of the Architectural Aluminum Manufacturer Association's publication number AAMA 2604-05 (Voluntary Specification, Performance Requirements and Test Procedures for High Performance Organic Coatings on Aluminum Extrusions and Panels) or 2605-05 (Voluntary Specification, Performance Requirements and Test Procedures for Superior Performing Organic Coatings on Aluminum Extrusions and Panels).

(24) "High-Temperature Coating" – A Coating that is certified to withstand a temperature of 1000 ºF for 24 hours.

(25) "Ink" – A fluid that contains dyes and/or colorants and is used to make markings but not to protect surfaces.

(26) "Magnetic Data Storage Disk Coating" – A Coating used on a metal disk which stores data magnetically.

(27) "Magnet Wire" – Wire used in electro-magnetic field application in electrical Equipment, such as transformers, motors, generators, and magnetic tape recorders.

(28) "Metal Container, Closure and Coil Coating Operations" – The application of any VOC-containing Coating to the surfaces of metal cans, Drums, Pails, lids, Closures, or to the surface of flat metal sheets, strips, rolls, or Coils during the manufacturing and/or reconditioning process.

(29) "Metallic Coating" – A Coating which contains more than five (5) grams of metal particles per liter of Coating, as applied. Metal Particles are pieces of a pure elemental metal or a combination of elemental metals.

(30) "Metal Parts and Products" – Any components or complete units fabricated from metal, excluding Aircraft or Aerospace Vehicles, Magnet Wire, Metal Containers, Closures and Coils, marine vessel exteriors, Motor Vehicles, Motor Vehicle Assembly Lines, Mobile Equipment or those subject to the coating provisions of any other source-specific rule of the District.

(31) "Military Specification Coating" – A Coating applied to Metal Parts and Products and which has a paint formulation approved by a United States Military Agency for use on military Equipment.

(32) "Mobile Equipment" – Any Equipment which may be drawn or is capable of being driven on a roadway, including, but not limited to, truck bodies, truck trailers, camper shells, mobile cranes, bulldozers, street cleaners, golf carts and implements of husbandry.

(33) "Mold-Seal Coating" – The initial Coating applied to a new mold or repaired mold to provide a smooth surface which, when coated with a mold release Coating, prevents products from sticking to the mold.

(34) "Motor Vehicle Rework" – The reconditioning of Motor Vehicles.

(35) "Multi-Component Coating" – A Coating requiring the addition of a separate reactive resin, commonly known as a catalyst or hardener, before application to form an acceptable dry film.

(36) "One-Component Coating" – A Coating that is ready for application as it comes out of its container to form an acceptable dry film. A thinner, necessary to reduce the viscosity, is not considered a component.

(37) "Pail" – Any cylindrical metal shipping container of at least 1 but less than 13 gallon capacity and constructed of 29 gauge or heavier material.

(38) "Pan-backing Coating" – A Coating applied to the surface of pots, pans, or other cooking implements that are exposed directly to a flame or other heating elements.

(39) "Performance Test" – A test conducted primarily for the purpose of researching and developing new processes and products, that is conducted under the close supervision of technically trained personnel, and that is not involved in the manufacture of final or intermediate products for commercial purposes, except in a de minimis manner.

(40) "Prefabricated Architectural Component Coatings" – Coatings applied to Metal Parts and Products which are to be used as an architectural structure.

(41) "Pretreatment Wash Primer" – Any Coating which contains no more than 12 percent solids by weight, and a minimum of 0.5 percent acid by weight, is necessary to provide surface etching and is applied directly to bare metal surfaces to provide corrosion resistance and adhesion, and ease of Stripping.

(42) "Repair Coating" – A Coating used to recoat portions of a product which has sustained mechanical damage to the original Coating following normal painting operations.

(43) "Safety-Indicating Coating" – A Coating which changes physical characteristics, such as color, to indicate unsafe conditions.

(44) "Silicone-Release Coating" – Any Coating which contains silicone resin and is intended to prevent food from sticking to metal surfaces such as baking pans.

(45) "Solar-Absorbent Coating" – A Coating which has as its primary purpose the absorption of solar radiation.

(46) "Solid-Film Lubricant" – Any very thin Coating consisting of a binder system, containing primarily one or more of molybdenum disulfide, graphite, polytetrafluoroethylene (PTFE) or other solids which act as dry lubricants between faying surfaces.

(47) "Stencil Coating" – An Ink or a pigmented Coating which is rolled or brushed onto a template or stamp for the purpose of adding identifying letters, numbers and/or other markings to Metal Parts and Products.

(48) "Stripper" – A material applied to the surface of any metal part of product to completely remove maskants, Coatings or Coating residues. A Stripper is not a surface preparation material or cleanup material. Material used for removal of overspray is not a Stripper.

(49) "Surface Preparation" – The removal of contaminants, including dust, oil and grease, prior to Coating applications.

(50) "Textured Finish" – Any rough surface produced by spraying large drops of Coating onto a previously coated surface.

(51) "Theoretical Potential Emissions" – The maximum capacity of a stationary source to emit a regulated air pollutant, based on the greater of design capacity or maximum production (based on 8760 hours/year), before add on controls.

(52) "Touch-Up Coating" – A Coating applied by brush or hand-held, non-refillable aerosol cans to repair minor surface damage and imperfections after the main coating operation.

(53) "Vacuum-Metalizing Coating" – The undercoat applied to the substrate on which the metal is deposited or the overcoat applied directly to the metal film.

(C) Requirements

(1) Transfer Efficiency

(a) A Person shall not apply any Coatings to Metal Parts and Products subject to the provisions of this Rule, unless the Coating is applied with Equipment properly operated according to manufacturer's suggested guidelines, and using one of the following application methods:

(i) Electrostatic Spray;
(ii) High Volume Low Pressure (HVLP) Spray Equipment;
(iii) Dip coat (including electrodeposition);
(iv) Flow coat;
(v) Roller Coat;
(vi) Airless spray;
(vii) Air-assisted airless spray;
(viii) Hand Application Methods;
(ix) Other coating application methods as are demonstrated to have a Transfer Efficiency at least equal to or better than achieved by HVLP spraying; or
(x) Equipment as approved by the APCO, CARB and USEPA, provided that the Owner/Operator submits an application and demonstrates that the use of HVLP spray Equipment would result in greater emissions than the proposed system Equipment. The approval shall be limited to only those Coatings listed in the application plan.

(2) VOC Content of Coatings

(a) A Person shall not apply any Coating to Metal Parts and Products, including any VOC-containing materials added to the original Coating supplied by the manufacturer, which contains VOC in excess of the limits specified in subsection (C)(2)(a)(i) below:

(i) COATING LIMITS
(Grams of VOC Per Liter of Coating, Less Water and Less Exempt Compounds)

Coating Category	Air-Dried		Baked	
	g/L	lb/gal	g/L	lb/gal
General One-Component*	340	(2.8)	275	(2.3)
General Multi-Component*	340	(2.8)	275	(2.3)
Military Specification	340	(2.8)	275	(2.3)
Etching Filler	420	(3.5)	420	(3.5)
Solar-Absorbent	420	(3.5)	360	3.0)
Heat-Resistant	420	(3.5)	360	(3.0)
High-Gloss	420	(3.5)	360	(3.0)
Extreme High-Gloss	420	(3.5)	360	(3.0)

Coating Category	Air-Dried		Baked	
	g/L	lb/gal	g/L	lb/gal
Metallic	420	(3.5)	420	(3.5)
Extreme-Performance	420	(3.5)	360	(3.0)
Prefabricated Architectural One-Component	420	(3.5)	275	(2.3)
Prefabricated Architectural Multi-Component	420	(3.5)	275	(2.3)
Touch-Up	420	(3.5)	360	(3.0)
Repair	420	(3.5)	360	(3.0)
Silicone-Release	420	(3.5)	420	(3.5)
High-Performance Architectural	420	(3.5)	420	(3.5)
Camouflage	420	(3.5)	420	(3.5)
Vacuum-Metalizing	420	(3.5)	420	(3.5)
Mold-Seal	420	(3.5)	420	(3.5)
High-Temperature	420	(3.5)	420	(3.5)
Electric-Insulating Varnish	420	(3.5)	420	(3.5)
Pan-Backing	420	(3.5)	420	(3.5)
Pretreatment Wash Primer	420	(3.5)	420	(3.5)
Clear	520	(4.3)	520	(4.3)
Drum (New, Exterior)	340	(2.8)	340	(2.8)
Drum (New, Interior)	420	(3.5)	420	(3.5)
Drum (Reconditioned, Exterior)	420	(3.5)	420	(3.5)
Drum (Reconditioned, Interior)	500	(4.2)	500	(4.2)
Chemical Agent Resistant	420	(3.5)	420	(3.5)

*A General Coating is a Coating that does not meet a specific Coating category definition and is assumed to be a general use Coating and subject to the VOC limit for a General Coating.

(3) Sell-Through and Use of Coatings

(a) The provisions of subsection (C)(2)(a)(i) above shall not apply to the General or Military Specification Coating Category limits until (one year from rule amendment). Until (one year from rule amendment), the following limits shall apply:

Category	Air-Dried		Baked	
	g/L	lb/gal	g/L	lb/gal
General (One- or Multi-Component)	420	(3.5)	360	(3.0)
Military Specification	420	(3.5)	360	(3.0)

(4) Add-On Control Alternative

(a) In lieu of complying with the VOC content limitations in subsection (C)(2) and (C)(3) above, air pollution Control Equipment with a capture and control system Combined Efficiency of at least 90%, as determined pursuant to subsections (G)(2)(g) and (G)(2)(h) of this Rule, may be used.

(5) Strippers, Surface Preparation and Cleanup Solvent

(a) The requirements of this Section shall apply to any Person using Solvent for Surface Preparation, cleanup, stripping, and paint removal, including paint spray Equipment.

(b) A Person shall not use VOC-containing materials for the cleanup of application Equipment used in coating operations, unless;

(i) Application Equipment cleaning Equipment requirements:
a. The application Equipment is disassembled and cleaned in an enclosed system during the washing, rinsing and draining processes; or
b. The application Equipment or Equipment parts are cleaned in a container which is open only when being accessed for adding, cleaning, or removing application equipment or when cleaning material is being added, provided the cleaned Equipment or Equipment parts are drained to the container until dripping ceases; or
c. Other application Equipment cleaning methods that are demonstrated to be as effective as the Equipment described above in minimizing emissions of VOC to the atmosphere are used, provided that the device has been approved in writing prior to use by the APCO, CARB and USEPA.

(ii) Closed containers or pipes to store and convey VOC-containing cleaning and cleaning waste materials are used;

(iii) Spills of VOC-containing cleaning and cleaning waste materials are minimized;

(iv) VOC emissions are minimized during cleaning operations.

(c) A Person shall not use VOC-containing materials for Surface Preparation and cleanup unless:

(i) The material contains 25 grams or less of VOC per liter of material (0.21 pounds per gallon); or

(ii) The material has an initial boiling point of 190 °C (374°F) or greater; or

(iii) The material has a total VOC vapor pressure of 8 mm Hg or less, at 20 °C (68 °F).

(d) A Person shall not use a Stripper on miscellaneous metal parts and products unless:

(i) The material contains 200 grams or less of VOC per liter of material (1.7 pounds per gallon).

(e) A Person shall use closed, nonabsorbent containers for the storage or disposal of cloth, paper, or any other absorbent material used for Solvent Surface Preparation and cleanup.

(6) Prohibition of Specifications

(a) A Person shall not specify the use in the District of any Coating to be applied to any metal parts and products subject to the provisions of this Rule that does not meet the limits and requirements of this Rule.

(7) Prohibition of Sale

(a) A Person shall not offer for sale or sell within the District any Coating, if such product is prohibited by any provisions of this Rule. The prohibition of this section shall apply to the sale of any Coating which will be applied at any physical location within the District.

(8) Compliance Statement Requirement

(a) The manufacturer of Coatings subject to this Rule shall provide on Coating containers or on separate data sheets the designation of VOC content as supplied, including Coating constituents. The VOC content shall be expressed in grams per liter or pounds per gallon, excluding water and exempt Solvents.

(9) Compliance Assurance Monitoring

(a) Any coating operation subject to subsection (C)(4) shall utilize Compliance Assurance Monitoring, as approved by the APCO, for any add-on Control Equipment used to meet the control requirement.

(b) Records of the monitoring device(s), mechanisms and/or techniques, and other data necessary to demonstrate compliance with the control requirements, shall be maintained and produced upon request of the APCO, pursuant to Section (F).

(c) Compliance with the add-on control requirements stipulated in subsection (C)(4) shall be determined by source testing and/or evaluating Compliance Assurance Monitoring data.

(d) Each monitoring device(s), mechanism and/or technique shall be calibrated/maintained in a manner approved by the APCO.

(D) Exemptions

(1) The provisions of this Rule shall not apply to Aerosol Coating Products.

(2) The provisions of subsection (C)(2), (C)(3) and (C)(4) of this Rule shall not apply to any Facility that does not exceed 10 tons per year Theoretical Potential Emissions of VOC, as defined in subsection (B)(51), subject to the following conditions:

(a) Any Person claiming exemption under this paragraph shall meet the certification requirements specified in subsection (E)(1) and the recordkeeping requirements specified in Section (F); and

(b) Any Facility operating under this exemption whose emissions exceed 10 tons on an annual basis shall henceforth be subject to subsections (C)(2), (C)(3) and (C)(4) of this Rule.

(3) The provisions of subsections (C)(1), (C)(2), (C)(3) and (C)(4) of this Rule shall not apply to:

(a) Any Facility which has a daily usage of less than one (1) gallon of Coating, including any VOC-containing materials added to the original Coating as supplied by the manufacturer, subject to this Rule;

(b) Total noncompliant Coating use per Facility that does not exceed 55 gallons per year;

(c) Stencil Coatings;

(d) Safety-indicating Coatings;

(e) Magnetic Data Storage Disk Coatings;

(f) Solid-film Lubricants;

(g) Adhesives;

(h) The coating of Motor Vehicle bodies at Motor Vehicle Rework facilities;

(i) Electric-insulating and thermal conducting Coatings.

(4) The provisions of subsection (C)(1) of this Rule shall not apply to Contract Painters while applying Coatings to objects on trays, provided no object has any dimension greater than 12 inches.

(5) The provisions of subsection (C)(1) of this Rule shall not apply to the application of Touch-up Coatings, Repair Coatings, Textured Coatings, Metallic Coatings which have a metallic content of more than 30 grams per liter, Mold-seal Coatings, or to facilities that use less than three (3) gallons of such Coatings per

day, as applied, including any VOC-containing materials added to the original Coatings as supplied by the manufacturer.

(6) The provisions of subsections (C)(1), (C)(2), (C)(3), (C)(4) and (C)(5) of this Rule shall not apply to the application of Coatings and use of cleaning Solvents while conducting Performance Tests on the Coatings at paint manufacturing facilities.

(7) The provisions of subsection (C)(1)(a)(ix) shall not apply to metal Coatings with a viscosity of 650 centipoise or greater, as applied, so long as (C)(1)(a)(x) is complied with.

(E) Administrative Requirements

(1) Certification Requirements for Facilities with Theoretical Potential Emissions of 10 Tons VOC or Less per Year:

(a) Any Person claiming an exemption under subsection (D)(2) of this Rule shall certify the exemption on an annual basis, by:

(i) Submitting a written certification to the APCO certifying that the affected Facility shall not emit VOCs in excess of 10 tons annually. At a minimum, the certification shall include the following information:

a. A summary of past annual usage of VOC-containing materials and related emissions; and

b. The Facility's Theoretical Potential Emissions of VOC, as defined in subsection (B)(51).

(F) Monitoring and Records

(1) Coating Records

(a) Any Facility or Person claiming exemption pursuant to subsections (D)(2), (D)(3)(a), (D)(3)(b) or (D)(5) shall meet the recordkeeping requirements of this Rule so as to be able to certify the exemption status.

(b) Any Person subject to subsections (C)(1), (C)(2), (C)(3), (C)(4), (C)(5) or (F)(1)(a) shall comply with the following requirements:

(i) The Person shall maintain and produce a current list of Coatings in use which provides all of the Coating data necessary to evaluate compliance, including, but not limited to, the following information, as applicable:

a. Coating, catalyst, and reducer used.

b. mix ratio of components used.

c. VOC content of Coating as applied.

(ii) The Person shall maintain and produce records on a daily basis, by permit unit, including:
a. Coating and mix ratio of components used in the Coating; and
b. quantity of each Coating applied.

(iii) The Person shall maintain and produce records on a daily basis showing the type and amount of Solvent used for cleanup, Surface Preparation, or paint removal.

(c) Any Facility or Person claiming an exemption pursuant to subsection (D)(2) of this Rule shall maintain and produce records of purchase orders and invoices of VOC-containing materials which specify the name of the materials in use. The requirements of this paragraph shall be in addition to all other applicable recordkeeping requirements specified in this Section.

(2) Add-on Control Equipment Records

(a) Any Person using emission Control Equipment, pursuant to subsection (C)(4), shall maintain and produce daily records of key system operating parameters and maintenance procedures which will demonstrate continuous operation and compliance of the emissions Control Equipment during periods of emissions-producing activities. Key system operating parameters are those necessary to ensure compliance with VOC content of Coating requirements, such as temperatures, pressures and flow rates.

(3) All records for the previous five (5) year period maintained and produced pursuant to this Section shall be retained and available for inspection by the APCO upon request.

(G) Test Methods

(1) A violation of the limits contained in this Rule, as determined by any one of the test methods listed below, shall constitute a violation of this Rule.

(2) The following specified test methods shall be used to determine compliance with the provisions of this Rule:

(a) The VOC content of Coatings and Solvents, as specified in subsections (C)(2), (C)(3), (C)(5)(c)(i) and (C)(5)(d)(i), shall be analyzed as prescribed by USEPA Reference Method 24 - *Determination of Volatile Matter Content, Water Content, Density, Volume Solids, and Weight Solids of Surface Coatings* for VOC content (without correction for exempt compounds) and ASTM D4457-85 - *Test Method for Determination of Dichloromethane and 1,1,1-Trichloroethane in Paints and Coatings by Direct Injection into a Gas Chromatograph,* or CARB Method 432 - *Determination of Dichloromethane and 1,1,1 - Trichloroethane in Paints and Coatings* (09/12/1989), for determination of emissions of exempt compounds. Perfluorocarbon compounds shall be assumed to be absent from a product or process unless a manufacturer or Facility Operator

identifies the specific individual compounds (from the broad classes of perfluorocarbon compounds) and the amounts present in the product or process and provides a validated test method which can be used to quantify the specific compounds.

(b) Determination of the initial boiling point of liquid containing VOC, subject to subsection (C)(5)(c)(ii), shall be conducted in accordance with ASTM D1078-86 - *Test Method for Distillation Range of Volatile Organic Liquids*.

(c) Calculation of total VOC vapor pressure for materials subject to subsection (C)(5)(c)(iii) shall be conducted in accordance with ASTM D2879-97 - *Test Method for Vapor Pressure-Temperature Relationship and Initial Decomposition Temperature of Liquids by Isoteniscope*. The fraction of water and Exempt Compounds in the liquid phase shall be determined by using ASTM D3792-91 - *Test Method for Water Content of Water-Reducible Paints by Direct Injection into a Gas Chromatograph* and D4457-85 - *Test Method for Determination of Dichloromethane and 1,1,1-Trichloroethane in Paints and Coatings by Direct Injection into a Gas Chromatograph* and shall be used to calculate the partial pressure of water and Exempt Compounds. The results of vapor pressure measurements obtained using ASTM D2879-97 shall be corrected for partial pressure of water and Exempt Compounds.

(d) Measurement of Solvent losses from alternative application cleaning Equipment subject to (C)(5)(b)(i)c shall be conducted in accordance with the South Coast Air Quality Management District's "General Test Method for Determining Solvent Losses from Spray Gun Cleaning Systems" (10/03/1989).

(e) Measurement of acid content of a substance shall be determined by ASTM D1613-85.

(f) Measurement of metal content of Coatings shall be determined in accordance with South Coast Air Quality Management District's "Laboratory Methods of Analysis for Enforcement Samples" manual, Method 311-91 – *Analysis of Percent Metal in Metallic Coatings by Spectrographic Method*, (06/01/1991).

(g) Capture Efficiency shall be determined according to USEPA's technical document, *Revised Capture Efficiency Guidance for Control of Volatile Organic Compound Emissions* (February 7, 1995).

(h) The control efficiency of the Control Equipment shall be determined according to USEPA Test Methods 25 - *Determination of Total Gaseous Nonmethane Organic Emissions as Carbon*, 25A - *Determination of Total Gaseous Organic Concentration Using a Flame Ionization Analyzer* or 25B - *Determination of Total Gaseous Organic Concentration Using a Nondispersive Infrared Analyzer* for measuring the total gaseous organic

concentrations at the inlet and outlet of the emissions Control Equipment, as contained in 40 CFR Part 60, Appendix A. USEPA Test Method 18 or CARB Method 422 - *Determination of Volatile Organic Compounds in Emissions from Stationary Sources (Exempt VOCs)* shall be used to determine emissions of Exempt Compounds.

(i) Measurement of solids content by weight of a substance shall be conducted in accordance with ASTM D1475-90 - *Test Method for Density of Paint, Varnish Lacquer, and Related Products*.

(j) Measurement of viscosity shall be conducted in accordance with ASTM D1200-14 – *Standard Test Method for Viscosity by Ford Viscosity Cup.*

(k) Alternative test methods may be used upon obtaining the approval of the APCO, CARB and USEPA.

(3) The following calculations shall be used to determine compliance with the provisions of this Rule:

(a) Grams of VOC Per Liter of Coating Less Water and Less Exempt Compounds (VOC Content):

$$G_v = \frac{W_s - W_w - W_{es}}{V_m - V_w - V_{es}}$$

Where:

G_v	=	Grams of VOC Per Liter of Coating Less Water and Less Exempt Compounds
W_s	=	Weight of volatile compounds in grams
W_w	=	Weight of water in grams
W_{es}	=	Weight of Exempt Compounds in grams
V_m	=	Volume of material in liters
V_w	=	Volume of water in liters
V_{es}	=	Volume of Exempt Compounds in liters

(b) Grams of VOC Per Liter of Material:

Where:

$$G_v = \frac{W_s - W_w - W_{es}}{V_m}$$

Where:

G_v	=	Grams of VOC Per Liter of Coating Less Water and Less Exempt Compounds
W_s	=	Weight of volatile compounds in grams
W_w	=	Weight of water in grams
W_{es}	=	Weight of Exempt Compounds in grams
V_m	=	Volume of material in liters

(4) The following test method is required for use in determining Transfer Efficiency of alternative application methods:

(a) Demonstration of Transfer Efficiency of alternative application methods subject to subsection (C)(1)(a)(x) shall be conducted in accordance with South Coast Air Quality Management District's "*Spray Equipment Transfer Efficiency Test Procedure for Equipment User*" (5/24/89).

See SIP Table at http://www.mdaqmd.ca.gov

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Mojave Desert
Air Quality Management District

Final

Staff Report
Amendments to
Rule 1115 – *Metal Parts & Products Coating Operations*

Amended on
January 22, 2018

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STAFF REPORT
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List of Acronyms

BACT	Best Available Control Technology
BARCT	Best Available Retrofit Control Technology
CARB	California Air Resources Board
CCAA	California Clean Air Act
CEQA	California Environmental Quality Act
CTG	Control Techniques Guidelines
FCAA	Federal Clean Air Act
H&S Code	California Health & Safety Code
MDAB	Mojave Desert Air Basin
MDAQMD	Mojave Desert Air Quality Management District
NOx	Oxides of Nitrogen
PM	Particulate Matter
RACM	Reasonably Available Control Measures
RACT	Reasonably Available Control Technology
SCAQMD	South Coast Air Quality Management District
SIP	State Implementation Plan
SOx	Oxides of Sulfur
TAC	Technical Advisory Committee
USEPA	United States Environmental Protection Agency
VOC	Volatile Organic Compounds

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STAFF REPORT

Rule 1115 – *Metal Parts & Products Coating Operations*

I. PURPOSE OF STAFF REPORT

A staff report serves several discrete purposes. Its primary purpose is to provide a summary and background material to the members of the Governing Board. This allows the members of the Governing Board to be fully informed before making any required decision. It also provides the documentation necessary for the Governing Board to make any findings, which are required by law to be made prior to the approval or adoption of a document. In addition, a staff report ensures that the correct procedures and proper documentation for approval or adoption of a document have been performed. Finally, the staff report provides evidence for defense against legal challenges regarding the propriety of the approval or adoption of the document.

II. EXECUTIVE SUMMARY

The Federal Clean Air Act (FCAA) requires areas designated non-attainment and classified moderate and above to implement Reasonably Available Control Technology (RACT) for sources subject to Control Techniques Guidelines (CTG) documents issued by United States Environmental Protection Agency (USEPA) for "major sources" of Volatile Organic Compounds (VOCs) and oxides of nitrogen (NO_X) which are ozone precursors. The District adopted the *2015 8-Hour Reasonably Available Control Technology – State Implementation Plan Analysis (RACT SIP Analysis)* in February, 2015 which committed to amending Rule 1115 – *Metal Parts & Products Coating Operations* to current Federal RACT. The MDAQMD has a metal parts and products coating operations rule which was amended April 22, 1996 and approved as RACT into the SIP in 1997 (62 FR 67002, 12/23/1997). This rule is subject to the CTG titled *Control Techniques Guidelines for Miscellaneous Metal and Plastic Parts Coatings* (EPA-453/R-08-003, September 2008), the CTG titled *Control of Volatile Organic Emissions From Existing Stationary Sources Volume VI: Surface Coating of Miscellaneous Metal Parts and Products* (EPA-450/2-78-015, June 1978), and the CTG titled *Control Techniques Guidelines: Industrial Cleaning Solvents* (EPA 453/R-06-001, September 2006). There are also two metal coating CTGs titled *Control Techniques Guidelines for Large Appliance Coatings* (EPA 453/R-07-004, September 2007) and *Control Techniques Guidelines for Metal Furniture Coatings (EPA 453/R-07-005, September 2007)* for which the District has filed Federal Negative Declarations (February 23, 2015).

The District has several facilities that primarily coat metal parts and products and some additional facilities that coat metal parts and products as part of their operations. There are no facilities that meet the specific applicability threshold of the *CTG for Miscellaneous Metal and Plastic Parts*, but there are major facilities that coat metal parts and products. The MDAQMD is proposing to update Rule 1115 – *Miscellaneous Metal Parts & Products Coating Operations* to reflect current federal RACT.

Additionally, the provisions of Health & Safety Code (H&S Code) §39614(d) required the adoption of certain control measures for Particulate Matter (PM) from a list promulgated by the

California Air Resources Board (CARB) contained in the *Proposed List of Measures to Reduce Particulate Matter – PM10 and PM2.5 (Implementation of Senate Bill 656, Sher 2003)*. Former H&S Code §39614(d) (expired by its own terms on January 1, 2011) required the adoption of the most readily available, feasible and cost-effective local control measures for PM as contained on a list developed by CARB. Furthermore, this list required the adoption of Reasonably Available Control Measures (RACM) for PM. The proposed amendments to Rule 1115 satisfy both of these requirements.

The proposed amendments to Rule 1115 address the *RACT SIP Analysis* and former H&S Code §39614(d) commitments. The proposed amendments update rule definitions; transfer efficiency requirements; coating limits; control device efficiency; work practices; VOC content for strippers and surface preparation materials; test methods; and, record retention requirements. A prohibition of sale requirement has been reinserted in the rule as suggested in the August 1997 Technical Support Document for EPA's Notice of Direct Final Rulemaking for Rule 1115 (62 FR 67002, 12/23/1997). The proposed amendments are based on the CTGs, and various other district rules deemed as fulfilling RACT requirements, including but not limited to: South Coast Air Quality Management District Rule 1107 – *Coating of Metal Parts and Products*, amended 01/06/2006 (73 FR 70883, 11/24/2008); Placer County Air Pollution Control District Rule 245 – *Surface Coating of Metal Parts and Products*, amended 08/20/2009 (76 FR 30025, 5/24/2011); and, San Joaquin Valley Unified Air Pollution Control District Rule 4603 – *Surface Coating of Metal Parts and Products, Plastic Parts and Products, and Pleasure Crafts*, amended 09/17/2009 (76 FR 67369, 11/01/2011).

III. STAFF RECOMMENDATION

Staff recommends that the Governing Board of the Mojave Desert Air Quality Management District (MDAQMD or District) amend proposed Rule 1115 – *Metal Parts & Products Coating Operations* and approve the appropriate California Environmental Quality Act (CEQA) documentation. This action is necessary to satisfy 42 U.S.C. §§7511a (FCAA §182) which requires that ozone non-attainment areas implement RACT for sources that are subject to CTGs and for major sources of ozone precursors. This amendment also satisfies a prior commitment to implement the provisions of H&S Code §39614(d) (expired by its own terms on January 1, 2011) which required the adoption of readily available, feasible and cost-effective control measures for Particulate Matter from a list of potential local control measures promulgated by CARB.

The Governing Board of the Mojave Desert Air Quality Management District amended Rule 1115 – *Metal Parts & Products Coating Operations* on January 22, 2018.

IV. LEGAL REQUIREMENTS CHECKLIST

The findings and analysis as indicated below are required for the procedurally correct amendments to Rule 1115 – *Metal Parts & Products Coating Operations*. Each item is discussed, if applicable, in Section V. Copies of related documents are included in the appropriate appendices.

FINDINGS REQUIRED FOR RULES & REGULATIONS:

X Necessity

X Authority

X Clarity

X Consistency

X Nonduplication

X Reference

X Public Notice & Comment

X Public Hearing

REQUIREMENTS FOR STATE IMPLEMENTATION PLAN SUBMISSION (SIP):

X Public Notice & Comment

X Availability of Document

X Notice to Specified Entities (State, Air Districts, USEPA, Other States)

X Public Hearing

X Legal Authority to adopt and implement the document.

X Applicable State laws and regulations were followed.

ELEMENTS OF A FEDERAL SUBMISSION:

X Elements as set forth in applicable Federal law or regulations.

CALIFORNIA ENVIRONMENTAL QUALITY ACT REQUIREMENTS (CEQA):

N/A Ministerial Action

N/A Exemption

X Negative Declaration

N/A Environmental Impact Report

X Appropriate findings, if necessary.

X Public Notice & Comment

SUPPLEMENTAL ENVIRONMENTAL ANALYSIS (RULES & REGULATIONS ONLY):

X Environmental impacts of compliance.

N/A Mitigation of impacts.

N/A Alternative methods of compliance.

OTHER:

X Written analysis of existing air pollution control requirements

N/A Economic Analysis

X Public Review

V. DISCUSSION OF LEGAL REQUIREMENTS

A. REQUIRED ELEMENTS/FINDINGS

This section discusses the State of California statutory requirements that apply to the amendments to Rule 1115. These are actions that need to be performed and/or information that must be provided in order to amend the rule in a procedurally correct manner.

1. State Findings Required for Adoption of Rules & Regulations:

Before adopting, amending, or repealing a rule or regulation, the District Governing Board is required to make findings of necessity, authority, clarity, consistency, non-duplication, and reference based upon relevant information presented at the hearing. The information below is provided to assist the Board in making these findings.

a. Necessity:

The amendments to Rule 1115 are necessary to satisfy 42 U.S.C. §§7511a (FCAA §182) which requires that ozone non-attainment areas implement RACT for sources that are subject to CTGs and for major sources of ozone precursors. While the District does not have sources meeting the threshold in the CTGs it does have major facilities which coat metal parts and products and thus a rule is required. Additionally, the District is amending this rule to satisfy a prior commitment to implement the provisions of H&S Code §39614(d) (expired by its own terms on January 1, 2011) which required the adoption of readily available, feasible and cost-effective control measures for Particulate Matter from a list of potential local control measures promulgated by CARB.

b. Authority:

The District has the authority pursuant to California Health and Safety Code (H&S Code) §40702 to adopt, amend or repeal rules and regulations.

c. Clarity:

The amendments to Rule 1115 are clear in that they are written so that the persons subject to the rule can easily understand the meaning.

d. Consistency:

The amendments to Rule 1115 are in harmony with, and not in conflict with or contradictory to any state law or regulation, federal

law or regulation, or court decisions. The rule is consistent with the CTG provisions. When analyzed, the provisions of Rule 1115 were determined to be readily available, feasible and cost-effective for PM control measures promulgated by CARB.

e. Nonduplication:

The proposed amendments to Rule 1115 do not impose the same requirements as any existing state or federal law. CTGs and the CARB *Proposed List of Measures to Reduce Particulate Matter – PM10 and PM2.5 (Implementation of Senate Bill 656, Sher 2003)* (former H&S Code §39614(d)) are primarily guidance documents and not enforceable in and of themselves. A rule is necessary to implement the applicable provisions of these documents.

f. Reference:

The District has the authority pursuant to H&S Code §40702 to adopt, amend or repeal rules and regulations.

g. Public Notice & Comment, Public Hearing:

Notice for the public hearing for the proposed amendments to Rule 1115 was published September 22, 2017 for the October 23, 2017 meeting. This item was continued to the January 22, 2018 Governing Board meeting to address comments from USEPA and industry. See Appendix "B" for a copy of the public notice. See Appendix "C" for copies of comments, if any, and District responses.

2. Federal Elements (SIP Submittals, Other Federal Submittals).

Submittals to USEPA are required to include various elements depending upon the type of document submitted and the underlying federal law that requires the submittal. The information below indicates which elements are required for the proposed amendments to of Rule 1115 and how they were satisfied.

a. Satisfaction of Underlying Federal Requirements:

The FCAA requires areas designated non-attainment and classified moderate and above to implement RACT for sources subject to CTG documents issued by USEPA for "major sources" of VOCs and NO_X that are ozone precursors. Because the District has an existing SIP rule for this CTG category, the District committed to adopting an updated RACT rule for metal parts and products coating operations. While the District does not have sources meeting the threshold in the CTGs it does have major facilities which coat metal parts and products and thus a rule is required. The proposed amendments are based on the CTGs and various

district rules deemed as fulfilling RACT requirements, including but not limited to: South Coast Air Quality Management District Rule 1107 – *Coating of Metal Parts and Products*; Placer County Air Pollution Control District Rule 245 – *Surface Coating of Metal Parts and Products*; and, San Joaquin Valley Unified Air Pollution Control District Rule 4603 – *Surface Coating of Metal Parts and Products, Plastic Parts and Products, and Pleasure Crafts*.

b. Public Notice and Comment:

Notice for the public hearing for the proposed amendments to Rule 1115 was published September 22, 2017 for the October 23, 2017 meeting. This item was continued to the January 22, 2018 Governing Board meeting to address comments from USEPA and industry. . See Appendix "B" for a copy of the public notice. See Appendix "C" for copies of comments, if any, and District responses.

c. Availability of Document:

Copies of the proposed amended Rule 1115 and the accompanying draft staff report were made available to the public on September 7, 2017. The proposed amendments were also reviewed by the Technical Advisory Committee (TAC), a committee consisting of a variety of regulated industry and local governmental entities, on August 7, 2017. The TAC had no objections on the preliminary draft of Rule 1115. The TAC reviewed the proposed rule amendments again on October 3, 2017. It was the consensus of the TAC to recommend submittal of Rule 1115 to the Governing Board for adoption on October 23, 2017. The TAC again reviewed the proposed draft of Rule 1115 on January 9, 2018. It was the consensus of the TAC to recommend submittal of Rule 1115 to the Governing Board for adoption.

d. Notice to Specified Entities:

Copies of proposed amended Rule 1115 and the accompanying draft staff report were sent to all affected agencies. The proposed amendments were sent to the California Air Resources Board (CARB) and USEPA on September 7, 2017.

e. Public Hearing:

A public hearing to consider the proposed amendments to of Rule 1115 was set for October 23, 2017. This item was continued to the next regularly scheduled meeting of January 22, 2018 to address substantive industry comment and comments from USEPA.

f. Legal Authority to Adopt and Implement:

The District has the authority pursuant to H&S Code §40702 to adopt, amend, or repeal rules and regulations and to do such acts as may be necessary or proper to execute the duties imposed upon the District.

g. Applicable State Laws and Regulations Were Followed:

Public notice and hearing procedures pursuant to H&S Code §§40725-40728 have been followed. See Section (V)(A)(1) above for compliance with state findings required pursuant to H&S Code §40727. See Section (V)(B) below for compliance with the required analysis of existing requirements pursuant to H&S Code §40727.2. See Section (V)(C) for compliance with economic analysis requirements pursuant to H&S Code §40920.6. See Section (V)(D) below for compliance with provisions of the CEQA.

B. WRITTEN ANALYSIS OF EXISTING REQUIREMENTS

H&S Code §40727.2 requires air districts to prepare a written analysis of all existing federal air pollution control requirements that apply to the same equipment or source type as the rule proposed for modification by the district.

The FCAA requires areas designated non-attainment for ozone and classified moderate and above to adopt and maintain RACT rules to control the emissions of VOCs and NO_X for categories which the USEPA has adopted a CTG and for all categories where there are major stationary sources of air pollution (42 U.S.C. §7511a(b)(2), FCAA 182(b)(2)). For purposes of the FCAA, portions of the District have been designated non-attainment for ozone and classified severe-17.

The MDAQMD has a metal parts and products coating operations rule which was amended April 22, 1996 and approved as RACT into the SIP in 1997 (62 FR 67002, 12/23/1997). This rule is subject to the CTG titled *Control Techniques Guidelines for Miscellaneous Metal and Plastic Parts Coatings* (EPA-453/R-08-003, September 2008), the CTG titled *Control of Volatile Organic Emissions From Existing Stationary Sources Volume VI: Surface Coating of Miscellaneous Metal Parts and Products* (EPA-450/2-78-015, June 1978), and the CTG titled *Control Techniques Guidelines: Industrial Cleaning Solvents* (EPA 453/R-06-001, September 2006). There are also two metal coating CTGs titled *Control Techniques Guidelines for Large Appliance Coatings* (EPA 453/R-07-004, September 2007) and *Control Techniques Guidelines for Metal Furniture Coatings (EPA 453/R-07-005, September 2007)* for which the District has filed Federal Negative Declarations (February 23, 2015). The proposed amendments are based on the CTGs, and various district rules deemed as fulfilling RACT requirements, including but not limited to: South Coast Air Quality Management District Rule 1107 – *Coating of Metal Parts and Products*, amended 01/06/2006 (73 FR 70883, 11/24/2008); Placer County Air

Pollution Control District Rule 245 – *Surface Coating of Metal Parts and Products*, amended 08/20/2009 (76 FR 30025, 5/24/2011); and, San Joaquin Valley Unified Air Pollution Control District Rule 4603 – *Surface Coating of Metal Parts and Products, Plastic Parts and Products, and Pleasure Crafts*, amended 09/17/2009 (76 FR 67369, 11/01/2011).

The District has several facilities that primarily coat metal parts and products, and additional facilities that coat metal parts and products as part of their operations. There are no facilities that meet the specific applicability threshold of the *CTG for Miscellaneous Metal and Plastic Parts*, but there are major facilities that coat metal parts and products.

Former H&S Code §39614(d) required the MDAQMD to adopt the most readily available, feasible and cost-effective local control measures for PM as contained on a list developed by CARB. CARB identified on its list of local control measures an item related to metal parts and products coating operations as potentially feasible. The District has evaluated the availability, feasibility and cost-effectiveness of applying those coating control measures related to metal parts and products coatings within the MDAQMD. The Proposed List of Measures to Reduce Particulate Matter – PM10 and PM2.5 (Implementation of Senate Bill 656, Sher 2003) approved by CARB November 18, 2004, Appendix C (SB 656 List of Air District Measures that Reduce Particulate Matter) Strategy 74 – Metal Parts and Products Coatings, directed the District to evaluate Rule 1115 against SCAQMD Rule 1107 as amended 11/9/01. This strategy "Limits VOC emissions from the coating of metal parts and products not regulated by other specific regulations by limiting coating VOC content to between 2.3-3.5 lbs/gal depending on process and coating type." The District evaluated Rule 1115 against SCAQMD Rule 1107 – *Coating of Metal Parts and Products*, amended 01/06/2006. The District analyzed specified VOC limits concurrent with the RACT analysis and implemented those applicable SCAQMD VOC coating limits in the current amendment of Rule 1115 , thereby meeting the obligation to former H&S Code §39614(d).

C. ECONOMIC ANALYSIS

1. General

RACT is defined as the lowest emissions limitation that a particular source is capable of meeting by the application of control technology that is reasonably available considering technological and economic feasibility (44 FR 53762, September 17, 1979). Rule 1115 is equivalent to rules that were determined by USEPA to fulfill RACT [1] This determination by USEPA means that the provisions of Rule 1115 are, by definition, cost effective.

[1] South Coast Air Quality Management District Rule 1107 – *Coating of Metal Parts and Products*, amended 01/06/2006 (73 FR 70883, 11/24/2008); Placer County Air Pollution Control District Rule 245 – *Surface Coating of Metal Parts and Products*, amended 08/20/2009 (76 FR 30025, 5/24/2011); and, San Joaquin Valley Unified Air Pollution Control District Rule 4603 – *Surface Coating of Metal Parts and Products, Plastic Parts and Products, and Pleasure Crafts*, amended 09/17/2009 (76 FR 67369, 11/01/2011).

2. Incremental Cost Effectiveness

Pursuant to H&S Code §40920.6, incremental cost effectiveness calculations are required for rules and regulations which are adopted or amended to meet the California Clean Air Act (CCAA) requirements for Best Available Retrofit Control Technology (BARCT) or "all feasible measures" to control volatile compounds (VOCs), oxides of nitrogen (NOx) or oxides of sulfur (SOx). The amendment of Rule 1115 is not subject to incremental cost effectiveness calculations because it does not involve BARCT or "all feasible measures".

D. ENVIRONMENTAL ANALYSIS (CEQA)

Through the process described below the appropriate CEQA process for the proposed amendments to Rule 1115 was determined.

1. The amendments to Rule 1151 meet the CEQA definition of "project". They are not "ministerial" actions.

2. The amendments to Rule 1115 are exempt from CEQA review because the amendments will not create any adverse impacts on the environment. The rule amendments are more stringent than the previous rule version. Because there is no potential that the amendments might cause the release of additional air contaminants or create any adverse environmental impacts, a Class 8 categorical exemption (14 Cal. Code Reg. §15308) applies. Copies of the documents relating to CEQA can be found in Appendix "D".

E. SUPPLEMENTAL ENVIRONMENTAL ANALYSIS

1. Potential Environmental Impacts

There are no potential adverse environmental impacts of compliance with the adoption of Rule 1115. Rule 1115 will impose additional controls on VOCs, control device efficiency, work practices, surface preparation and cleanup solvent VOC limits.

2. Mitigation of Impacts

N/A.

3. Alternative Methods of Compliance

N/A

F. PUBLIC REVIEW

See Staff Report Section (V)(A)(1)(g) and (2)(b), as well as Appendix "B"

VI. TECHNICAL DISCUSSION

A. SOURCE DESCRIPTION

This Rule shall apply to all metal coating operations, except those performed on Aircraft or Aerospace Vehicles; Magnet Wire; Metal Containers, Closures and Coils; marine vessel exteriors; Motor Vehicles; Motor Vehicle Assembly Lines; Mobile Equipment; or those operations subject to the coating provisions of any other source-specific rule of the District.

B. EMISSIONS

The proposed amendments update rule definitions; transfer efficiency requirements; coating limits; control device efficiency; work practices; VOC content for strippers and surface preparation materials; test methods; and, record retention requirements. A requirement for prohibition of sale has been reinserted in the rule as suggested in the August 1997 Technical Support Document for EPA's Notice of Direct Final Rulemaking for Rule 1115 (62 FR 67002, 12/23/1997).

C. CONTROL REQUIREMENTS

Please see section (C) of the rule (Appendix A) for control requirements.

The amendments to Rule 1115 – *Metal Parts & Products Coating Operations* do not cause the release of additional air contaminants or create any environmental impacts.

Subsection (C)(1)(a) proposes application methods that are consistent with the CTG for Miscellaneous Metal and Plastic Parts Coatings. This subsection has also been modified to allow for the use of equipment approved for applying high viscosity coatings when the emissions are lower than those attained by HVLP equipment. Subsection (C)(2) coating limits have been adjusted to those that are consistent with current federal RACT limits. Drum coating categories contained in the CTG for Miscellaneous Metal and Plastic Parts Coatings have been added to the coating limits table. Subsection (C)(3) capture and control system combined efficiency has been changed from 85% to 90%. Subsection (C)(4) includes work practices from the CTG for Miscellaneous Metal and Plastic Parts Coatings. VOC limits for strippers and solvent cleaning materials have been updated to current federal RACT limits. Subsection (C)(6) reinserted within the rule as requested in EPA's Technical Support Document for Rule 1115, Metal Parts and Products Coating Operations, August 1997.

D. PROPOSED RULE SUMMARY

This section gives a brief overview of the proposed amendments to Rule 1151.

Minor format changes have been made throughout which are for consistency and not substantive. These changes include, but are not limited to, capitalization of defined terms, relocation of commonly defined terms to Rule 102, updating cross references, and including the complete titles of referenced rule and test method titles.

Section (B) has been modified to update existing definitions, remove unused definitions, remove definitions that are contained in Rule 102, and add definitions for specialty coating categories.

> Definitions removed because already included in Rule 102, or relocated to Rule 102: Air Pollution Control Officer (APCO); Air-dried Coating; Baked Coating; California Air Resources Board (CARB); Control Device; District; High Volume, Low Pressure (HVLP) Spray; Motor Vehicle; United States Environmental Protection Agency (USEPA); Volatile Organic Compound (VOC).
>
> Definitions modified to provide clarity and consistency: Electric-insulating Varnish; Extreme-performance Coating; High-performance Architectural Coating; Metallic Coating; Pretreatment Wash Primer; Touch-up Coating.
>
> Definitions added: Chemical Agent Resistant Coating (CARC); Electrocoating (Electrodeposition); Electrostatic Spray; Multi-Component Coating; One-Component Coating; Stripper.

Subsection (C)(1) contains additional application methods added for consistency with the CTG for Miscellaneous Metal and Plastic Parts Coatings. This section has also been modified to allow for the use of equipment approved for applying high viscosity coatings when the emissions are lower than those attained by HVLP equipment. Additionally, APCO discretion has been modified to include CARB and USEPA. "Or" qualifier has been moved from end of subsection (xiii) to (ix).

Subsection (C)(2) coating limits have been adjusted to those that are consistent with current federal RACT limits. Drum coating categories contained in the CTG for Miscellaneous Metal and Plastic Parts Coatings have been added to the coating limits table.

Subsection (C)(2)(b) has been removed. This section was not applicable after April 22, 1998. This Section has been revised and renumbered as (C)(3) to incorporate an Sell Through and Use provision as requested by industry. There are only two existing rule categories that have been lowered and given a one year sell through and use accommodation. These categories are "General" and Military Specification".

Subsection (C)(4) capture and control system combined efficiency has been changed from 85% to 90%.

Subsection (C)(5) includes work practices from the CTG for Miscellaneous Metal and Plastic Parts Coatings. VOC limits for strippers and solvent cleaning materials have been updated to current federal RACT limits. Subsection (5)(b) was restructured at the recommendation of USEPA for clarity.

Subsection (C)(7) reinserted within the rule as requested in EPA's Technical Support Document for Rule 1115, Metal Parts and Products Coating Operations, August 1997.

Subsection (D)(7) has been added pursuant to industry request that high viscosity coatings may be exempt from transfer efficiency requirements if they meet certain criteria. See Staff Report Appendix "C" for comment and response. This provision is consistent with proposed language in SCAQMD rules 1168 and 1107.

Subsection (E)(2) has been removed. This section was not applicable after April 22, 1998. The current limits of the rule are applicable and are not proposed for change at this time.

Subsection (F)(1)(a) has been modified to properly incorporate reference to subsection (D)(5).

Subsection (F)(3) recordkeeping retention limit has been increased from 2 to 5 years as requested in EPA's Technical Support Document for Rule 1115, Metal Parts and Products Coating Operations, August 1997.

Section (G) updated to include full title and date of ASTM or EPA-approved state or local test methods being specified pursuant to USEPA Little Bluebook, August 21, 2001.

E. FCAA 110(l) (42 U.S.C. §7410(l)) ANALYSIS

Rule 1115 was originally adopted 03/02/92, and subsequently amended 04/22/96. The SIP approved version of Rule 1115 is the 04/22/96 amendment, approved at 62 FR 67002, 12/23/97. This version of the rule is the only rule applicable in the MDAQMD, including the Blythe/Palo Verde area of Riverside County that was acquired from the SCAQMD. The 110(l) analysis will be based on the differences between the 04/22/96 MDAQMD amendment and the current proposed amendment.

Several definitions have been relocated to existing Rule 102. Many terms are defined in multiple district rules. In addition, many of these definitions are exact or near exact duplicates of each other. Pursuant to Governing Board direction regarding streamlining, the Air Pollution Control Officer (APCO) has determined that shifting common definitions to Rule 102 and updating them for consistency will improve clarity. Reference to Rule 102 has been added to Rule 1115. Several definitions specific to Rule 1115 have been added or updated for consistency with the CTG or other RACT rules. Changes in definitions are more current and specific; therefore not a relaxation.

Additional application requirements have been added for consistency with the *CTG for Miscellaneous Metal and Plastic Parts Coatings*, which is intended to provide information to assist in determining RACT. Application methods are all required to have transfer efficiency at least equal to or better than HVLP as defined. As such, all application methods are at least as stringent to the existing requirements of the rule, therefore not a relaxation.

VOC coating categories and limits have been derived from the *CTG for Miscellaneous Metal and Plastic Parts Coatings* or other district rules. VOC limits have been tightened and are more stringent for consistency with the CTG and rules determined to meet federal RACT.

- "General" coating category has been separated to "General One-Component" and "General Multi-component." Both categories are lower than the existing Rule 1115 limits for Air-Dried and Baked categories and consistent with the *CTG for Miscellaneous Metal and Plastic Parts Coatings*. Those Districts with lower limits for "General One-Component" have rule applicability to two CTGs for which the District has filed Federal Negative Declarations: *Control Techniques Guidelines for Large Appliance Coatings* (EPA 453/R-07-004, September 2007) and *Control Techniques Guidelines for Metal Furniture Coatings (EPA 453/R-07-005, September 2007)*.

- "Military Specification" coating category has been lowered from the existing rule version limit to the limit contained in the *CTG for Miscellaneous Metal and Plastic Parts Coatings*.

- "Prefabricated Architectural Component" coating category has been separated to "Prefabricated Architectural One-Component" and "Prefabricated Architectural Multi-Component." Both categories are the same as existing limits for Air-Dried and Baked limits and consistent with the *CTG for Miscellaneous Metal and Plastic Parts Coatings*.

- "Drum (New, Exterior)", "Drum (New, Interior)", "Drum (Reconditioned, Exterior)" and "Drum (Reconditioned, Interior)" are new coating categories derived from the *CTG for Miscellaneous Metal and Plastic Parts Coatings*. The District has no sources subject to this CTG source category, and has not filed a FND for this source category. Incorporating these categories remedies the need to file a FND.

- "Chemical Agent Resistant Coating" category has been separated out and defined. San Diego APCD definition of CARC includes CARC provisions and the MDAQMD definition for Camouflage. For clarity, the MDAQMD added a separate CARC category in addition to the existing Camouflage category. The CARC coating category limit is the same as the existing Camouflage category limit. Addition of the CARC category is not a relaxation of the existing category limits.

Air Pollution control equipment capture and control system combined efficiency has been increased from 85% to 90%. This increase in efficiency strengthens the rule to the provisions in the *CTG for Miscellaneous Metal and Plastic Parts Coatings*.

Work practices have been incorporated from those provided in the *CTG for Miscellaneous Metal and Plastic Parts Coatings.* These practices expand and strengthen existing work practices.

VOC limit for surface cleaning and cleanup materials has been reduced from 200 grams or less of VOC per liter of material to 25 grams or less of VOC per liter of material. This is lower that the RACT limit set in the *CTG for Miscellaneous Metal and Plastic Parts Coatings,* meeting limits deemed RACT in subsequently adopted district rules. A VOC

limit for stripping was not specified in the previous amendment of Rule 1115. The District has proposed to retain a VOC limit for strippers of 200 grams or less of VOC per liter of material. This limit is not a relaxation, as strippers would previously have been assigned to the surface preparation and cleanup solvent category of 200 grams or less of VOC per liter of material. Strippers are separately defined with specific use restrictions. The provision for allowing a separate stripper limit is consistent with several rules deemed to meet RACT (Placer Rule 245 and Sacramento Metropolitan AQMD Rule 451).

A provision for "Prohibition of Sale" was reinserted within the rule as requested in *EPA's Technical Support Document for Rule 1115, Metal Parts and Products Coating Operations*, August 1997. This corrects a requested rule deficiency and strengthens the rule.

Record retention has been increased from 24 months to five years. This strengthens the rule.

Test methods have been updated pursuant to 40 CFR 60.17, USEPA Region 9 Air Emissions Test Methods, and USEPA Little Bluebook, August 21, 2001. This clarifies and strengthens the rule.

An exemption for Electric-insulating and Thermal-conducting coating has been added. Small use of specialized electric-insulating and thermal-conducting coating exists for companies that operate in the jurisdiction of multiple Air Districts. The specific product that has been referenced can be used to coat electrical connections, rotor windings, oil reservoirs, rotors and stators. An exemption is warranted because of the unavailability of general use coatings that provide the necessary performance these coatings provide. This exemption is also consistent with an exemption in SCAQMD Rule 1107, Northern Sierra AQMD Rule 228, and Santa Barbara County APCD Rule 330. Low usage could have previously been covered under the exemption allowing for total noncompliant coating use per facility that does not exceed 55 gallons per year, so this not a rule relaxation. Adding this exemption merely provides clarification for consistency and resemblance to neighboring district rules.

No part of the rule has been omitted, except those sections that have been superseded by date, or updated to current language. These minor changes and updates do not relax the rule.

F. SIP HISTORY

1. SIP History.

On July 1, 1993 the MDAQMD was formed pursuant to statute. Pursuant to statute it also retained all the rules and regulations of the San Bernardino County Air Pollution Control District (SBCAPCD) until such time as the Governing Board of the MDAQMD wished to adopt, amend or rescind such rules. The MDAQMD Governing Board, at its very first meeting, reaffirmed all the rules and regulations of the SBCAPCD. Rule 1115 was adopted 03/02/92 and subsequently

amended 04/22/1996. This 1996 version was also applicable to the Riverside County portion of the MDAQMD which was acquired from SCAQMD on 07/01/1994. The 04/22/1996 version was determined to fulfill RACT and was included in the State Implementation Plan (SIP) for the entire MDAQMD (62 FR 67002, 12/23/1997).

2. SIP Analysis.

The District will request CARB to submit the proposed amendments to Rule 1115 to replace the 1996 SIP version. While not specifically mentioned in the Direct Final Rule for the 04/22/1996 version of Rule 1115 (62 FR 67002, 12/23/1997), the District assumes that the approval action was for both the San Bernardino County portion of the MDAB and the Blythe/Palo Verde Valley portion of Riverside County, and that SCAQMD Rule 1107 – *Coating of Metal Parts and Products* was thereby removed from the SIP for the Blythe/Palo Verde Valley portion of Riverside County.

This submission is necessary to satisfy 42 U.S.C. §§7511a (FCAA §182) which requires that ozone non-attainment areas implement RACT for sources that are subject to CTGs and for major sources of ozone precursors.

Former H&S Code §39614(d) (expired by its own terms on January 1, 2011) required the adoption of the most readily available, feasible and cost-effective local control measures for PM as contained on a list developed by the CARB. In addition, this document required the adoption of Reasonably Available Control Measures (RACM) for PM. The proposed amendments to Rule 1115 satisfy both of these requirements as detailed in §(V)(B).

Since there are previously existing SIP rules for this category the District will request that they be superseded. In order to replace existing SIP rules the District is required to show that the proposed amendments are not less stringent than the provisions currently in the SIP. Proposed Rule 1115 is more stringent than the previous SIP version because the amendments update transfer efficiency requirements, coating limits, control device efficiency, work practices, VOC content for strippers and surface preparation materials, test methods, record retention requirements and add back in a requirement for prohibition of sale. Therefore, the proposed amendments to Rule 1115 are more stringent than the 1996 version of the rule.

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Appendix "A"

Rule 1151 – *Metal Parts & Products Coating Operations* Iterated Version

The iterated version is provided so that the changes to an existing rule may be easily found. The manner of differentiating text is as follows:

1. Underlined text identifies new or revised language.

2. ~~Lined out text~~ identifies language which is being deleted.

3. Normal text identifies the current language of the rule which will remain unchanged by the adoption of the proposed amendments.

4. *[Bracketed italicized text]* is explanatory material that is not part of the proposed language. It is removed once the proposed amendments are adopted.

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RULE 1115
Metal Parts & Products Coating Operations

(A) General

(1) Purpose

(a) The purpose of this Rule is to limit the emission of Volatile Organic Compounds from the coating of Metal Parts and Products.

(2) Applicability

(a) This Rule shall apply to all metal coating operations, except those performed on Aircraft or Aerospace Vehicles; Magnet Wire; Metal Containers, Closures and Coils; marine vessel exteriors; Motor Vehicles; Motor Vehicle Assembly Lines; Mobile Equipment; or those operations subject to the coating provisions of any other source-specific rule of the District.

(b) Any coating, coating operation, or facility which is exempt from all or a portion of the VOC limits of this Rule shall comply with the provisions of Rule 442.

(B) Definitions

The definitions contained in District Rule 102 – *Definition of Terms* shall apply unless the term is otherwise defined herein: *[Definitions that are commonly used throughout the MDAQMD rule book have been relocated to existing Rule 102 which was most recently amended June 12, 2017, and will be amended concurrently with this amendment.]* ~~For the purpose of this Rule, the following definitions shall apply:~~

(1) "Adhesive" - Any substance that is used to bond surfaces together by adhesion.

(2) "Aerosol Coating Product" - A pressurized coating product containing pigments or resins that dispenses product ingredients by means of a propellant, and is packaged in a disposable can for hand-held application, or for use in specialized equipment for ground traffic/marking applications.

~~(3) "Air Pollution Control Officer" (APCO) - The person appointed to the position of Air Pollution Control Officer of the District pursuant to the provisions of California Health & Safety Code §40750, and his or her designee.~~ *[See District Rule 102 §(6).]*

(43) "Aircraft or Aerospace Vehicle" - Any fabricated part, assembly of parts or completed unit of any aircraft, helicopter, missile or space vehicle.

~~(5) "Air-dried Coating" - A coating that is cured at a temperature below 90°C (194°F). *[Moved to Rule 102.]*~~

(~~6~~4) "Assembly Line" - An arrangement of industrial equipment and workers in which the product passes from one specialized operation to another until complete, either by automatic or manual means.

~~(7) "Baked Coating" - A coating that is cured at a temperature at or above 90°C (194°F). *[Moved to Rule 102.]*~~

(~~8~~5) "Camouflage Coating" - A coating used, principally by the military, to conceal equipment from detection

~~(9) "California Air Resources Board" (CARB) - The California State Air Resources Board the powers and duties of which are described in Part 2 of Division 26 of the California Health & Safety Code (commencing with Section 39500). *[See District Rule 102 §(14).]*~~

(6) "Chemical Agent Resistant Coating" (CARC) – A coating applied to military tactical equipment in order to protect the equipment from chemical warfare agents. *[Derived from SDAPCD Rule 67.3 (c)(5). Language for camouflage not incorporated as rule has a separate definition.]*

(~~10~~7) "Clear Coating" - A coating that either lacks color and opacity, or is transparent, and uses the surface to which it is applied as a reflective base or undertone color.

(~~11~~8) "Closure" - Any component which is used to close or seal a filled can, jar or bottle.

~~(12) "Coating" - A material which is applied to a surface and which forms a continuous film in order to beautify and/or protect such surface. *[See Rule 102.]*~~

(~~13~~9) "Coil" - Any flat metal sheet or strip that is rolled or wound in concentric rings.

(~~14~~10) "Combined Efficiency" - The capture efficiency multiplied by the ~~control~~ Control ~~device~~ Equipment efficiency, expressed as an overall weight percent.

~~(15) "Compliance Assurance Monitoring" - Total equipment, mechanism(s), and/or technique(s) used to demonstrate and insure compliance with the control device efficiency requirements stipulated in subsection (C)(3) of this Rule. Such monitoring is used to analyze and/or provide a permanent record of process parameters, such as temperatures, pressures and flow rates. *[See Rule 102.]*~~

(~~16~~11) "Contract Painter" - A non-manufacturer of Metal Parts and Products who applies coatings to such products at his facility exclusively under contract with one or more parties that operate under separate ownership and control.

~~(17) "Control Device" - Equipment used to reduce, by destruction or removal, the amount of air pollutant(s) in an air stream prior to discharge to the ambient air.~~ *[See District Rule 102 §(24) for Control Equipment.]*

~~(18) "District" - The Mojave Desert Air Quality Management District the geographical area of which is described in District Rule 103.~~ *[See District Rule 102 §(25)*

(~~19~~12) "Drum" - Any cylindrical metal shipping container of 13 to 110 gallon capacity.

(13) "Electric-insulating and Thermal-conducting Coating" – A Coating that displays an electrical insulation of at least 1000 volts DC per mil on a flat test plate and an average thermal conductivity of at least 0.27 BTU per hour-foot-degree-Fahrenheit. *[Derived from SCAQMD Rule 1107, Santa Barbara County APCD Rule 330 and Northern Sierra County APCD Rule 228.]*

(~~20~~14) "Electric-insulating Varnish" - A non-convertible-type coating applied to electrical motors, ~~or~~ components of electrical motors, or power transformers, to provide electrical, mechanical, and environmental protection or resistance. *[Updated with definition from CTG for Miscellaneous Metal and Plastic Parts Coatings.]*

(15) "Electrocoating (Electrodeposition)" – A process that uses Coating concentrates or pastes added to a water bath. The coating is applied using either an electric current in either an anodic or cathodic bath. *[Derived from SCAQMD Rule 1107(b)(13), Placer County APCD Rule 245 §221.]*

(16) "Electrostatic Spray" – A Coating application method accomplished by charging atomized paint particles for deposition by electrostatic attraction on a metal part or product. *[Derived from SDAPCD Rule 67.3 (c)(10).]*

(~~21~~17) "Etching Filler" - A coating that contains less than 23 percent solids by weight and at least 1/2 percent acid by weight, and is used instead of applying a pretreatment coating followed by a primer.

(~~22~~18) "Extreme high-gloss Coating" - A coating which, when tested by the American Society for Testing Material (ASTM) Method D-523-1980 ~~adopted in 1980~~, shows a reflectance of 75 percent or more on a 60° ~~□~~ meter.

(~~23~~19) "Extreme-performance Coating" - A coating used on a metal surface where the coated surface is, in its intended use, exposed to any of the following: *[Modified to reflect CTG for Miscellaneous Metal and Plastic Parts Coatings definition.]*

(a) Repeated heavy abrasion, including mechanical wear and repeated scrubbing with ~~Industrial~~industrial-grade solvents, detergents, cleaners, or abrasive scouring agents;

(b) Frequent or chronic exposure to salt water, corrosives, caustics, acids, oxidizing agents, chemicals, chemical fumes, chemical mixtures or solutions; ~~or~~

(c) Repeated exposure to temperatures in excess of 250ºF;

~~(c) Other similar environmental conditions as determined in writing by the District's APCO, pursuant to subsection (E)(2) of this Rule.~~ *[Section (E)(2) is no longer applicable.]*

Extreme performance coatings include, but are not limited to, coatings applied to locomotives, railroad cars, farm machinery, and heavy duty trucks.

~~(24) "Grams of VOC per liter of coating, less water and less exempt compounds" - The weight of VOC per combined volume of VOC and coating solids when calculated by the following equation:~~ *[See definition in Rule 102, and equation in §(G)(3).]*

$$\frac{Grams\ VOC_{(less\ water\ and\ exempt\ compounds)}}{Liter\ of\ Coating} = \left[\frac{(W_s - W_w - W_{es})}{(V_m - V_w - V_{es})}\right]$$

~~Where:~~

~~W_s = weight of volatile compounds in grams, including water and exempt compounds~~

~~W_w = weight of water in grams~~

~~W_{es} = weight of exempt compounds in grams~~

~~V_m = volume of material in liters, including water and exempt compounds~~

~~V_w = volume of water in liters~~

~~V_{es} = volume of exempt compounds in liters~~

~~(25) "Grams of VOC per liter of material" - The weight of VOC per volume of material when calculated by the following equation:~~ *[See definition in Rule 102, and equation in §(G)(3).]*

~~$Grams\ of\ VOC\ per\ Liter\ of\ Material = \left[\frac{(W_s - W_w - W_{es})}{V_m}\right]$~~

~~Where:~~

~~W_s = weight of volatile compounds in grams, including water and exempt compounds~~

~~W_w = weight of water in grams~~

~~W_{es} = weight of exempt compounds in grams~~

~~V_m = volume of material in liters, including water and exempt compounds~~

(~~26~~20) "Hand Application Methods" - The application of coatings by manually held, non-mechanically operated equipment. Such equipment includes paint brushes, hand rollers, caulking guns, trowels, spatulas, syringe daubers, rags and sponges.

(~~27~~21) "Heat-resistant Coating" - A coating that must withstand a temperature of at least 400°F (204°C) during normal use.

(~~28~~22) "High-gloss Coating" - A coating which, when tested in accordance with ASTM Method D-523~~-89 adopted in 1989~~, shows a reflectance of 85 percent or more on a 60° meter.

(~~29~~23) "High-performance Architectural Coating" - A coating used to protect architectural subsections and which meets the requirements of the Architectural Aluminum Manufacturer Association's publication number AAMA ~~605.2-1980~~2604-05 (Voluntary Specification, Performance Requirements and Test Procedures for High Performance Organic Coatings on Aluminum Extrusions and Panels) or 2605-05 (Voluntary Specification, Performance Requirements and Test Procedures for Superior Performing Organic Coatings on Aluminum Extrusions and Panels). *[Updated for consistency with the CTG for Miscellaneous Metal and Plastic Parts.]*

(~~30~~24) "High-temperature Coating" - A coating that is certified to withstand a temperature of 1000°~~o~~F for 24 hours.

~~(31) "High-Volume, Low-Pressure (HVLP) Spray" - Equipment used to apply coatings by means of a gun which operates at a permanent pressure of between 0.1 and 10 psig, measured at the air cap of the coating application system, and a permanent liquid coating pressure of not more than 50 psig. *[See District Rule 102 §(48)*~~

(~~32~~25) "Ink" - A fluid that contains dyes and/or colorants and is used to make markings but not to protect surfaces.

(~~33~~26) "Magnetic Data Storage Disk Coating" - A coating used on a metal disk which stores data magnetically.

(~~34~~27) "Magnet Wire" - Wire used in electro-magnetic field application in electrical equipment, such as transformers, motors, generators, and magnetic tape recorders.

(~~35~~28) "Metal Container, Closure and Coil Coating Operations" - The application of any VOC-containing coating to the surfaces of metal cans, Drums, Pails, lids, Closures, or to the surface of flat metal sheets, strips, rolls, or Coils during the manufacturing and/or reconditioning process.

(29) "Metallic Coating" - A coating which contains more than five (5) grams of metal particles per liter of coating, as applied. Metal Particles are pieces of a pure elemental metal or a combination of elemental metals. *[Modified to reflect CTG for Miscellaneous Metal and Plastic Parts Coatings definition.]*

(~~36~~30) "Metal Parts and Products" - Any components or complete units fabricated from metal, excluding Aircraft or Aerospace Vehicles, Magnet Wire, Metal Containers, Closures and Coils, marine vessel exteriors, Motor Vehicles, Motor Vehicle Assembly Lines, Mobile Equipment or those subject to the coating provisions of any other source-specific rule of the District.

~~(37) "Metallic Coating" - A coating which contains more than 5 grams of metal per liter of coating, as applied.~~ *[Alphabetized. See (B)(29)*

(~~38~~31) "Military Specification Coating" - A coating applied to Metal Parts and Products and which has a paint formulation approved by a United States Military Agency for use on military equipment.

(~~39~~32) "Mobile Equipment" - Any equipment which may be drawn or is capable of being driven on a roadway, including, but not limited to, truck bodies, truck trailers, camper shells, mobile cranes, bulldozers, street cleaners, golf carts and implements of husbandry.

(~~40~~33) "Mold-seal Coating" - The initial coating applied to a new mold or repaired mold to provide a smooth surface which, when coated with a mold release coating, prevents products from sticking to the mold.

~~(41) "Motor Vehicle" - A passenger vehicle, light-duty truck, medium-duty vehicle, or a heavy-duty vehicle as defined in Section 415 of the California Vehicle Code.~~*[See District Rule 102 §(52).]*

(~~42~~34) "Motor Vehicle Rework" - The reconditioning of Motor Vehicles.

(35) "Multi-Component Coating" – A coating requiring the addition of a separate reactive resin, commonly known as a catalyst or hardener, before application to form an acceptable dry film. *[Modified to reflect CTG for Miscellaneous Metal and Plastic Parts Coatings definition.]*

(36) "One-Component Coating" – A coating that is ready for application as it comes out of its container to form an acceptable dry film. A thinner, necessary to reduce the viscosity, is not considered a component. *[Modified to reflect CTG for Miscellaneous Metal and Plastic Parts Coatings definition.]*

(~~43~~37) "Pail" - Any cylindrical metal shipping container of at least 1 but less than 13 gallon capacity and constructed of 29 gauge or heavier material.

(~~44~~38) "Pan-backing Coating" - A coating applied to the surface of pots, pans, or other cooking implements that are exposed directly to a flame or other heating elements.

(~~45~~39) "Performance Test" - A test conducted primarily for the purpose of researching and developing new processes and products, that is conducted under the close supervision of technically trained personnel, and that is not involved in the manufacture of final or intermediate products for commercial purposes, except in a de minimis manner.

(~~46~~40) "Prefabricated Architectural Component Coatings" - Coatings applied to Metal Parts and Products which are to be used as an architectural structure.

(~~47~~41) "Pretreatment Wash Primer" - Any coating which contains no more than 12 percent solids by weight, and a minimum of 0.5 percent acid by weight, is necessary to provide surface etching and is applied directly to bare metal surfaces to provide corrosion resistance and adhesion, and ease of Stripping. *[Modified to reflect CTG for Miscellaneous Metal and Plastic Parts Coatings definition.]*

(~~48~~42) "Repair Coating" - A coating used to recoat portions of a product which has sustained mechanical damage to the original coating following normal painting operations.

(~~49~~43) "Safety-indicating Coating" - A coating which changes physical characteristics, such as color, to indicate unsafe conditions.

(~~50~~44) "Silicone-release Coating" - Any coating which contains silicone resin and is intended to prevent food from sticking to metal surfaces such as baking pans.

(~~51~~45) "Solar-absorbent Coating" - A coating which has as its primary purpose the absorption of solar radiation.

(~~52~~46) "Solid-film Lubricant" - Any very thin coating consisting of a binder system, containing primarily one or more of molybdenum disulfide, graphite, polytetrafluoroethylene (PTFE) or other solids which act as dry lubricants between faying surfaces.

(~~53~~47) "Stencil Coating" - An ink or a pigmented coating which is rolled or brushed onto a template or stamp for the purpose of adding identifying letters, numbers and/or other markings to Metal Parts and Products.

(48) "Stripper" A material applied to the surface of any metal part of product to completely remove maskants, coatings or coating residues. A stripper is not a surface preparation material or cleanup material. Material used for removal of overspray is not a stripper. *[Derived from PCAPCD Rule 245 §265.]*

(~~54~~49) "Surface Preparation" - The removal of contaminants, including dust, oil and grease, prior to coating applications.

(~~55~~50) "Textured Finish" - Any rough surface produced by spraying large drops of coating onto a previously coated surface.

(~~56~~51) "Theoretical Potential Emissions" - The maximum capacity of a stationary source to emit a regulated air pollutant, based on the greater of design capacity or maximum production (based on 8760 hours/year), before add on controls.

(~~57~~52) "Touch-up Coating" - A coating applied by brush or hand-held, non-refillable aerosol cans to repair minor surface damage and imperfections after the main coating operation. *[Modified for clarity.]*

~~(58) "Transfer Efficiency" - The ratio of the weight or volume of coating solids adhering to an object to the total weight or volume of coating solids used in the application process, expressed as a percentage.~~ *[See Rule 102.]*

~~(59) "United States Environmental Protection Agency" (USEPA) - The United States Environmental Protection Agency, the Administrator of the USEPA and his or her authorized representative.~~ *[See District Rule 102.]]*

(~~60~~53) "Vacuum-metalizing Coating" - The undercoat applied to the substrate on which the metal is deposited or the overcoat applied directly to the metal film.

~~(61) "Volatile Organic Compound (VOC)" - Any compound of carbon, excluding carbon monoxide, carbon dioxide, carbonic acid, metallic carbides or carbonates, and ammonium carbonate, which participates in atmospheric photochemical reactions and those compounds listed in 40 CFR 51.100(s)(1).~~ *[See District Rule 102 §(98)].*

(C) Requirements

(1) Transfer Efficiency

(a) A person shall not apply any coatings to Metal Parts and Products subject to the provisions of this Rule, unless the coating is applied with equipment properly operated according to manufacturer's suggested guidelines, and using one of the following application methods: *[Additional application methods added for consistency with the CTG for Miscellaneous Metal and Plastic Parts Coatings.]*

(i) Electrostatic ~~attraction~~Spray; ~~or~~
(ii) High Volume Low Pressure (HVLP) Spray equipment; ~~or~~
(iii) Dip coat (including electrodeposition); ~~or~~ *[Defined in Rule 102.]*
(iv) Flow coat; *[Defined in Rule 102.]*

(v) Roller Coat; *[Defined in Rule 102.]*
(vi) Airless spray;
(vii) Air-assisted airless spray;
(~~i~~viii) Hand Application Methods; ~~or~~
(~~v~~ix) Other coating application methods as are demonstrated to have a Transfer Efficiency at least equal to ~~one~~ or better than achieved by HVLP spraying; or~~of the above methods, and which are used in such a manner that the parameters under which they were tested are permanent features of the method. Prior to their use, such coating applications shall be approved in writing by the APCO~~.
(x) Equipment as approved by the APCO, CARB and USEPA, provided that the owner/operator submits an application and demonstrates that the use of HVLP spray equipment would result in greater emissions than the proposed system equipment. The approval shall be limited to only those coatings listed in the application plan. *[Added pursuant to industry request that high viscosity coatings may be exempt from transfer efficiency requirements if they meet certain criteria. Derived from SCAQMD Proposed Amended Rule 1107, 7/10/12. See Staff Report Appendix "C" for public comment and response. "Or" relocated to between (C)(1)(a)(ix) and (C)(1)(a)(x) pursuant to USEPA verbal comment, 12/18/17. Typographical error corrected (listen to listed) pursuant to USEPA verbal comment, 12/18/17. APCO discretion removed pursuant to USEPA verbal comment, 12/18/17.]*

(2) VOC Content of Coatings ~~:~~

(a) A person shall not apply any coating to Metal Parts and Products, including any VOC-containing materials added to the original coating supplied by the manufacturer, which contains VOC in excess of the limits specified in subsection (C)(2)(a)(i) below:

(i) COATING LIMITS
(Grams of VOC Per Liter of Coating, Less Water and Less Exempt Compounds)

Coating Category	Air-Dried		Baked	
	g/L	lb/gal	g/L	lb/gal
General One-component*	~~420~~340	(~~3.5~~2.8)	~~360~~275	(~~3.0~~2.3)
General Multi-Component*	340	(2.8)	275	(2.3)
Military Specification	~~420~~340	(~~3.5~~2.8)	~~360~~275	(~~3.0~~2.3)
Etching Filler	420	(3.5)	420	(3.5)
Solar-Absorbent	420	(3.5)	360	3.0)
Heat-Resistant	420	(3.5)	360	(3.0)
High-Gloss	420	(3.5)	360	(3.0)

Coating Category	Air-Dried		Baked	
	g/L	lb/gal	g/L	lb/gal
Extreme High-Gloss	420	(3.5)	360	(3.0)
Metallic	420	(3.5)	420	(3.5)
Extreme-Performance	420	(3.5)	360	(3.0)
~~Prefabricated Architectural Component~~	~~420~~	~~(3.5)~~	~~275~~	~~(2.3)~~
Prefabricated Architectural One-Component	420	(3.5)	275	(2.3)
Prefabricated Architectural Multi-Component	420	(3.5	275	(2.3)
—Touch-Up[#]	420	(3.5)	360	(3.0)
—Repair[#] ~~———~~	420	(3.5)	360	(3.0)
—Silicone-Release[#]	420	(3.5)	420	(3.5)
High-Performance – Architectural	420	(3.5)	420	(3.5)
—Camouflage[#]	420	(3.5)	420	(3.5)
—Vacuum-Metalizing[#]	420	(3.5)	420	(3.5)
—Mold-Seal[#]	420	(3.5)	420	(3.5)
—High-Temperature[#]	420	(3.5)	420	(3.5)
Electric-Insulating Varnish	420	(3.5)	420	(3.5)
—Pan-Backing[#]	420	(3.5)	420	(3.5)
Pretreatment Wash Primer	420	(3.5)	420	(3.5)
Clear ~~Coating~~	520	(4.3)	520	(4.3)
Drum (New, Exterior)[+]	340	(2.8)	340	(2.8)
Drum (New, Interior)[+]	420	(3.5)	420	(3.5)
Drum (Reconditioned, Exterior)[+]	420	(3.5)	420	(3.5)
Drum (Reconditioned, Interior)[+]	500	(4.2)	500	(4.2)
Chemical Agent Resistant[@]	420	(3.5)	420	(3.5)

*A General Coating is a coating that does not meet a specific coating category definition and is assumed to be a general use coating and subject to the VOC limit for a General Coating.

[#]Specified categories appeared to be subcategories of either "Prefabricated Architectural" or "High Performance Architectural" in the previous rule version. These are actually stand-alone categories. Format has been changed to properly reflect this status.

[+]Coating Categories and limits derived from CTG for Miscellaneous Metal and Plastic Parts Coatings.

[@]Coating category derived from San Diego APCD Rule 67.3.

(3) Sell-Through and Use of Coatings

(a~~b~~) The provisions of subsection (C)(2)(a)(i) above shall not apply to ~~Extreme Performance Coatings used at military installations~~the General or Military Specification Coating Category limits ~~and subject to the provisions of this Rule~~ until ~~April 22, 1998~~ (one year from rule amendment)~~. In the interim, a person shall not apply any Extreme Performance Coating at such installations which contains VOC in excess of the following limits, after the specified date:~~. Until (one year from rule amendment), the following limits shall apply:

Category	Air-Dried		Baked	
	g/L	lb/gal	g/L	lb/gal
General (One- or Multi-Component)	420	(3.5)	360	(3.0)
Military Specification	420	(3.5)	360	(3.0)

~~(i) On or after April 22, 1996:~~

~~Air-Dried~~		~~Baked~~	
~~g/L~~	~~lb/gal~~	~~g/L~~	~~lb/gal~~
~~588~~	~~(4.9)~~	~~588~~	~~(4.9)~~

~~(ii) Any person seeking the use an Extreme Performance coating subject to the provisions specified in this subsection shall submit an Extreme Performance Coating Petition, pursuant to the requirements of subsection (E)(2).~~

[This section was not applicable after April 22, 1998. The section has been modified to allow a reasonable time for users of these products to sell or use materials on hand.]

(4~~3~~) Add-On Control Alternative

(a) In lieu of complying with the VOC content limitations in subsection (C)(2) and (C)(3) above, air pollution control equipment with a capture and control system Combined Efficiency of at least ~~85~~90%, as determined pursuant to subsections (G)(2)(g) and (G)(2)(h) of this Rule, may be used. *[Updated for consistency with the CTG for Miscellaneous Metal and Plastic Parts Coatings to meet current federal RACT.]*

(5~~4~~) Strippers, Surface Preparation and Cleanup Solvent

(a) The requirements of this Section shall apply to any person using solvent for Surface Preparation, cleanup, stripping, and paint removal, including paint spray equipment.

(b) A person shall not use VOC-containing materials for the cleanup of application equipment used in coating operations, unless: ~~such material is collected in a closed container when not in use; and~~ *[See (ii) below. Following subsections reorganized for clarity pursuant to USEPA verbal comment, 12/18/17.]*

(i) Application equipment cleaning equipment requirements:

a. The application equipment is disassembled and cleaned in an enclosed system during the washing, rinsing and draining processes; or

~~(ii)~~ b. The application equipment or equipment parts are cleaned in a container which is open only when being accessed for adding, cleaning, or removing application equipment or when cleaning material is being added, provided the cleaned equipment or equipment parts are drained to the container until dripping ceases; or

~~(iii)~~ c. Other application equipment cleaning methods that are demonstrated to be as effective as the equipment described above in minimizing emissions of VOC to the atmosphere are used, provided that the device has been approved in writing prior to use by the APCO, CARB and USEPA. *[APCO discretion eliminated pursuant to USEPA verbal comment, 12/18/17.]*

(ii) Closed containers or pipes to store and convey VOC-containing cleaning and cleaning waste materials are used; *[Derived from CTG for Miscellaneous Metal and Plastic Parts Coating work practices.]*

(iii) Spills of VOC-containing cleaning and cleaning waste materials are minimized; or *[Derived from CTG for Miscellaneous Metal and Plastic Parts Coating work practices.]*

(iv) VOC emissions are minimized during cleaning operations; or *[Derived from CTG for Miscellaneous Metal and Plastic Parts Coating work practices.]*

(c) A person shall not use VOC-containing materials for Surface Preparation and cleanup unless:

(i) The material contains 25~~00~~ grams or less of VOC per liter of material (0.21~~1.67~~ pounds per gallon); or

(ii) The material has an initial boiling point of 190°C (374°F) or greater; or

(iii) The material has a total VOC vapor pressure of 8~~20~~ mm Hg or less, at 20°C (68°F). *[Updated value from CTG: Industrial Cleaning Solvents.]*

(d) A person shall not use a Stripper on miscellaneous metal parts and products unless: *[Derived from SMAQMD Rule 451-8 §303 and PCAPCD Rule 245 §303.]*

(i) The material contains 200 grams or less of VOC per liter of material (1.7 pounds per gallon).

(e~~d~~) A person shall use closed, nonabsorbent containers for the storage or disposal of cloth, paper, or any other absorbent material used for solvent Surface Preparation and cleanup.

(6~~5~~) Prohibition of Specifications~~:~~

(a) A person shall not specify the use in the District of any coating to be applied to any metal parts and products subject to the provisions of this Rule~~,~~ that does not meet the limits and requirements of this Rule.

(7) Prohibition of Sale

(a) A person shall not offer for sale or sell within the District any coating, if such product is prohibited by any provisions of this Rule. The prohibition of this section shall apply to the sale of any coating which will be applied at any physical location within the District. *[Derived from MDAQMD Rule 1115 §(C)(6), Draft 5D, 3/13/96. This section reinserted within the rule as requested in EPA's Technical Support Document for Rule 1115, Metal Parts and Products Coating Operations, August 1997.*

(8~~6~~) Compliance Statement Requirement:

(a) The manufacturer of coatings subject to this Rule shall provide on coating containers or on separate data sheets the designation of VOC content as supplied, including coating constituents. The VOC content shall be expressed in grams per liter or pounds per gallon, excluding water and exempt solvents.

(9~~7~~) Compliance Assurance Monitoring

(a) Any coating operation subject to subsection (C)(4~~3~~) shall utilize Compliance Assurance Monitoring, as approved by the APCO, for any add-on Control ~~Device~~ Equipment used to meet the control requirement. *[Updated for consistency with Rule 102 definition.]*

(b) Records of the monitoring device(s), mechanisms and/or techniques, and other data necessary to demonstrate compliance with the control

requirements, shall be maintained and produced upon request of the APCO, pursuant to Section (F).

(c) Compliance with the add-on control requirements stipulated in subsection (C)(43) shall be determined by source testing and/or evaluating Compliance Assurance Monitoring data.

(d) Each monitoring device(s), mechanism and/or technique shall be calibrated/maintained in a manner approved by the APCO.

(D) Exemptions

(1) The provisions of this Rule shall not apply to aerosol coating products.

(2) The provisions of subsection (C)(2), (C)(3) and (C)(43) of this Rule shall not apply to any facility that does not exceed 10 tons per year Theoretical Potential Emissions of VOC, as defined in subsection (B)(5654), subject to the following conditions:

(a) Any person claiming exemption under this paragraph shall meet the certification requirements specified in subsection (E)(1) and the recordkeeping requirements specified in Section (F); and

(b) Any facility operating under this exemption whose emissions exceed 10 tons on an annual basis shall henceforth be subject to subsections (C)(2), (C)(3) and (C)(43) of this Rule.

(3) The provisions of subsections (C)(1), (C)(2), (C)(3) and (C)(43) of this Rule shall not apply to:

(a) Any facility which has a daily usage of less than one (1) gallon of coating, including any VOC-containing materials added to the original coating as supplied by the manufacturer, subject to this Rule;

(b) Total noncompliant coating use per facility that does not exceed 55 gallons per year;

(c) Stencil Coatings;

(d) Safety-indicating Coatings;

(e) Magnetic Data Storage Disk Coatings;

(f) Solid-film Lubricants;

(g) Adhesives;

(h) The coating of Motor Vehicle bodies at Motor Vehicle Rework facilities;

(i) Electric-insulating and thermal conducting coatings. *[Derived from SCAQMD Rule 1107, Santa Barbara County APCD Rule 330, and Northern Sierra AQMD Rule 228.]*

(4) The provisions of subsection (C)(1) of this Rule shall not apply to Contract Painters while applying coatings to objects on trays, provided no object has any dimension greater than 12 inches.

(5) The provisions of subsection (C)(1) of this Rule shall not apply to the application of Touch-up Coatings, Repair Coatings, Textured coatings, Metallic Coatings which have a metallic content of more than 30 grams per liter, Mold-seal Coatings, or to facilities that use less than three (3) gallons of such coatings per day, as applied, including any VOC-containing materials added to the original coatings as supplied by the manufacturer.

(6) The provisions of subsections (C)(1), (C)(2), (C)(3), (C)(~~43~~) and (C)(5~~4~~) of this Rule shall not apply to the application of coatings and use of cleaning solvents while conducting Performance Tests on the coatings at paint manufacturing facilities.

(7) The provisions of subsection (C)(1)(a)(ix) shall not apply to metal coatings with a viscosity of 650 centipoise or greater, as applied, so long as (C)(1)(a)(x) is complied with. *[Added pursuant to industry request that high viscosity coatings may be exempt from transfer efficiency requirements if they meet certain criteria. See Staff Report Appendix "C" for public comment and response.]*

(E) Administrative Requirements

(1) Certification Requirements for Facilities with Theoretical Potential Emissions of 10 Tons VOC or Less per Year:

(a) Any person claiming an exemption under subsection (D)(2) of this Rule shall certify the exemption on an annual basis, by:

(i) Submitting a written certification to the APCO certifying that the affected facility shall not emit VOCs in excess of 10 tons annually. At a minimum, the certification shall include the following information:

a~~1~~. A summary of past annual usage of VOC-containing materials and related emissions; and

b~~2~~. The facility's Theoretical Potential Emissions of VOC, as defined in subsection (B)(5~~1~~6). *[Updated citation and numbering convention.]*

~~(2) Extreme Performance Coating Petition - Military Installations Only (Required through April 22, 1998)~~

~~(a) Any person seeking to use an Extreme-performance Coating in any military coating operation which is subject to the provisions of this Rule shall comply with the following requirements, prior to the application of such coating:~~

~~(i) A petition shall be submitted to the APCO stating the performance requirements, volume of coating, and VOC level which is attainable. Attainable VOC level must comply with the VOC limits and associated compliance dates set forth in subsection (C)(2)(b).~~

~~(ii) If the APCO grants written approval, such petition shall be resubmitted for approval on an annual basis. Approval of subsequent petitions shall be granted only through April 22, 1998.~~

~~(iii) If the APCO grants written approval, such approval shall contain volume and VOC limit conditions.~~

~~(iv) Records shall be maintained pursuant to Section (F).~~

[The provisions of this section are no longer applicable. The current limits of the rule have been applicable to military installations since April 22, 1998 and are not proposed for change at this time. There is no need for a special petition for usage of Extreme Performance Coating at military installations any longer.]

(F) Monitoring and Records

(1) Coating Records

(a) Any facility or person claiming exemption pursuant to subsections (D)(2), (D)(3)(a), ~~or~~ (D)(3)(b) or (D)(5) shall meet the recordkeeping requirements of this Rule so as to be able to certify the exemption status. *[Reference updated for completeness pursuant to USEPA verbal comment, 12/18/17.]*

(b) Any person subject to subsections (C)(1), (C)(2), (C)(3), (C)(~~4~~3), (C)(5~~4~~) or (F)(1)(a) shall comply with the following requirements: *[Updated numbering convention.]*

(i) The person shall maintain and produce a current list of coatings in use which provides all of the coating data necessary to evaluate compliance, including, but not limited to, the following information, as applicable:

a~~1~~. coating, catalyst, and reducer used.

b~~2~~. mix ratio of components used.

c~~3~~. VOC content of coating as applied.

(ii) The person shall maintain and produce records on a daily basis, by permit unit, including:

a~~1~~. coating and mix ratio of components used in the coating; and

b2. quantity of each coating applied.

(iii) The person shall maintain and produce records on a daily basis showing the type and amount of solvent used for cleanup, Surface Preparation, or paint removal.

(c) Any facility or person claiming an exemption pursuant to subsSection (D)(2) of this Rule shall maintain and produce records of purchase orders and invoices of VOC-containing materials which specify the name of the materials in use. The requirements of this paragraph shall be in addition to all other applicable recordkeeping requirements specified in this Section.

(2) Add-on Control Equipment Records

(a) Any person using an emission Control Device Equipmentor system, pursuant to subsection (C)(43), shall maintain and produce daily records of key system operating parameters and maintenance procedures which will demonstrate continuous operation and compliance of the emissions Control Device Equipment during periods of emissions-producing activities. Key system operating parameters are those necessary to ensure compliance with VOC content of coating requirements, such as temperatures, pressures and flow rates. *[Updated for consistency with Rule 102 definition.]*

(3) All records for the previous 24 monthfive (5) year period maintained and produced pursuant to this Section shall be retained and available for inspection by the APCO upon request. *[Updated as requested in EPA's Technical Support Document for Rule 1115, Metal Parts and Products Coating Operations, August 1997.]*

(G) Test Methods *[Updated pursuant to 40 CFR 60.17, USEPA Region 9 Air Emissions Test Methods, and USEPA Little Bluebook, August 21, 2001.]*

(1) A violation of the limits contained in this Rule, as determined by any one of the test methods listed below, shall constitute a violation of this Rule.

(2) The following specified test methods shall be used to determine compliance with the provisions of this Rule:

(a) The VOC content of coatings and solvents, as specified in subsections (C)(2), (C)(3), and (C)(54)(c)(i) and (C)(5)(d)(i), shall be analyzed as prescribed by USEPA Reference Method 24 *- Determination of Volatile Matter Content, Water Content, Density, Volume Solids, and Weight Solids of Surface Coatings* for VOC content (without correction for exempt compounds) and ASTM D4457-85 *- Test Method for Determination of Dichloromethane and 1,1,1-Trichloroethane in Paints and Coatings by Direct Injection into a Gas Chromatograph*, or CARB Method 432 *- Determination of Dichloromethane and 1,1,1 -*

Trichloroethane in Paints and Coatings (09/12/1989), for determination of emissions of exempt compounds. Perfluorocarbon compounds shall be assumed to be absent from a product or process unless a manufacturer or facility operator identifies the specific individual compounds (from the broad classes of perfluorocarbon compounds) and the amounts present in the product or process and provides a validated test method which can be used to quantify the specific compounds.

(b) Determination of the initial boiling point of liquid containing VOC, subject to subsection (C)(54)(c)(ii), shall be conducted in accordance with ASTM D1078-86 - *Test Method for Distillation Range of Volatile Organic Liquids*.

(c) Calculation of total VOC vapor pressure for materials subject to subsection (C)(54)(c)(iii) shall be conducted in accordance with ASTM D2879-8697 - *Test Method for Vapor Pressure-Temperature Relationship and Initial Decomposition Temperature of Liquids by Isoteniscope*. The fraction of water and exempt compounds in the liquid phase shall be determined by using ASTM D3792-91 - *Test Method for Water Content of Water-Reducible Paints by Direct Injection into a Gas Chromatograph* and D4457-85 - *Test Method for Determination of Dichloromethane and 1,1,1-Trichloroethane in Paints and Coatings by Direct Injection into a Gas Chromatograph* and shall be used to calculate the partial pressure of water and exempt compounds. The results of vapor pressure measurements obtained using ASTM D2879-9786 shall be corrected for partial pressure of water and exempt compounds.

(d) Measurement of solvent losses from alternative application cleaning equipment subject to (C)(54)(b)(iii) shall be conducted in accordance with the South Coast Air Quality Management District's "General Test Method for Determining Solvent Losses from Spray Gun Cleaning Systems" (11/1/9410/03/1989).

(e) Measurement of acid content of a substance shall be determined by ASTM D1613-85.

(f) Measurement of metal content of coatings shall be determined in accordance with South Coast Air Quality Management District's "Laboratory Methods of Analysis for Enforcement Samples" manual, Method 311-91 - "Determination *Analysis of Percent Metal in Metallic Coatings by Spectrographic Method*", (06/01/1991)Method 311".

(g) Capture Efficiency shall be determined according to USEPA's technical document, ""*Revised Capture Efficiency Guidance for Control of Volatile Organic Compound Emissions*" (February 7, 1995).Guidelines for Determining Capture Efficiency" (1/9/95).

(h) The control efficiency of the Control ~~Device~~ Equipment shall be determined according to USEPA Test Methods 25 *- Determination of Total Gaseous Nonmethane Organic Emissions as Carbon*, 25A *- Determination of Total Gaseous Organic Concentration Using a Flame Ionization Analyzer* or 25B *- Determination of Total Gaseous Organic Concentration Using a Nondispersive Infrared Analyzer* for measuring the total gaseous organic concentrations at the inlet and outlet of the emissions Control ~~Device~~Equipment, as contained in 40 CFR Part 60, Appendix A. USEPA Test Method 18 or CARB Method 422 *- Determination of Volatile Organic Compounds in Emissions from Stationary Sources (Exempt VOCs)* shall be used to determine emissions of exempt compounds.

(i) Measurement of solids content by weight of a substance shall be conducted in accordance with ASTM D1475-~~60~~90 *- Test Method for Density of Paint, Varnish Lacquer, and Related Products*.

(j) Measurement of viscosity shall be conducted in accordance with ASTM D1200-14 – *Standard Test Method for Viscosity by Ford Viscosity Cup. [Method proposed in the SCAQMD amendment for Rule 1107, July 2012, as the appropriate methods for determining viscosity.]*

(k~~j~~) Alternative test methods may be used upon obtaining the approval of the APCO, CARB and USEPA.

(3) The following calculations shall be used to determine compliance with the provisions of this Rule::

(a) Grams of VOC Per Liter of Coating Less Water and Less Exempt Compounds" (VOC Content):

$$G_v = \frac{W_s - W_w - W_{es}}{V_m - V_w - V_{es}}$$

Where:

G_v	=	Grams of VOC per Liter of Coating Less Water and Less Exempt Compounds
W_s	=	Weight of volatile compounds in grams
W_w	=	Weight of water in grams
W_{es}	=	Weight of exempt compounds in grams
V_m	=	Volume of material in liters

V_w = Volume of water in liters

V_{es} = Volume of exempt compounds in liters

(b) Grams of VOC Per Liter of Material:

Where:

$$G_v = \frac{W_s - W_w - W_{es}}{V_m}$$

Where:

G_v = Grams of VOC Per Liter of Coating Less Water and Less Exempt Compounds

W_s = Weight of volatile compounds in grams

W_w = Weight of water in grams

W_{es} = Weight of exempt compounds in grams

V_m = Volume of material in liters

(~~3~~4) The following test method is ~~recommended~~ required for use in determining Transfer Efficiency of alternative application methods: *[Renumbered and updated to pursuant USEPA verbal comment, 12/18/17.]*

(a) Demonstration of Transfer Efficiency of alternative application methods subject to subsection (C)(1)(a)(~~v~~ix) shall be conducted in accordance with South Coast Air Quality Management District's "*Spray Equipment Transfer Efficiency Test Procedure for Equipment User*" (5/24/89).

See SIP Table at http://www.mdaqmd.ca.gov

~~[SIP: Approved 12/23/97, 62 FR 67002, effective 2/26/98, 40 CFR 52.220(c)(239)(i)(A)(2); Submitted as adopted 03/02/92 on 6/19/92.]~~

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Appendix "B"
Public Notice Documents

1. Proof of Publication – Riverside Press Enterprise, September 22, 2017
2. Proof of Publication – Daily Press, September 22, 2017

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THE PRESS-ENTERPRISE

1825 Chicago Ave, Suite 100
Riverside, CA 92507
951-684-1200
951-368-9018 FAX

PROOF OF PUBLICATION
(2010, 2015.5 C.C.P)

Publication(s): The Press-Enterprise

PROOF OF PUBLICATION OF

Ad Desc.: /

I am a citizen of the United States. I am over the age of eighteen years and not a party to or interested in the above entitled matter. I am an authorized representative of THE PRESS-ENTERPRISE, a newspaper in general circulation, printed and published daily in the County of Riverside, and which newspaper has been adjudicated a newspaper of general circulation by the Superior Court of the County of Riverside, State of California, under date of April 25, 1952, Case Number 54446, under date of March 29, 1957, Case Number 65673, under date of August 25, 1995, Case Number 267864, and under date of September 16, 2013, Case Number RIC 1309013; that the notice, of which the annexed is a printed copy, has been published in said newspaper in accordance with the instructions of the person(s) requesting publication, and not in any supplement thereof on the following dates, to wit:

09/22/2017

I certify (or declare) under penalty of perjury that the foregoing is true and correct.

Date: September 22, 2017
At: Riverside, California

Legal Advertising Representative, The Press-Enterprise

MOJAVE DESERT AQMD
14306 PARK AVE
ATTN: D. HERNANDEZ
VICTORVILLE, CA 92392

Ad Number: 0011012355-01

P.O. Number:

Ad Copy:

NOTICE OF HEARING

NOTICE IS HEREBY GIVEN that the Governing Board of the Mojave Desert Air Quality Management District (MDAQMD) will conduct a public hearing on October 23, 2017 at 10:00 A.M. to consider the proposed amendment of Rule 102 – Definition of Terms, Rule 461 – Gasoline Transfer and Dispensing, Rule 462 – Organic Liquid Loading, Rule 463 – Storage of Organic Liquids, Rule 1115 – Metal Parts & Products Coating Operations, and Rule 1160 –Internal Combustion Engines.

SAID HEARING will be conducted in the Governing Board Chambers located at the MDAQMD offices 14306 Park Avenue, Victorville, CA 92392-2310 where all interested persons may be present and be heard. Copies of the proposed rules and the associated Staff Reports are on file and may be obtained from the Executive Office Manager at the MDAQMD Offices. Written comments may be submitted to Brad Poiriez, APCO at the above office address. Written comments should be received no later than October 20, 2017 to be considered. If you have any questions regarding Rule 102 or Rule 1115 you may contact Tracy Walters at (760) 245-1661 extension 6122 for further information. If you have any questions regarding Rules 461, 462, or 463 you may contact Michelle Zumwalt at extension 5756 for further information. If you have any questions regarding Rule 1160 you may contact Sheri Haggard at extension 1864 for further information. Traducción esta disponible por solicitud.

The proposed amendment of Rule 102 – Definition of Terms is necessary to shift common definitions used in the MDAQMD rulebook to Rule 102, and to update them for consistency and clarity.

Rules 461, 462, 463, 1115 and 1160 are proposed for amendment to satisfy 42 U.S.C. §7511a (Federal Clean Air Act (FCAA) §182) which requires that ozone non-attainment areas implement Reasonably Available Control Technology (RACT) for sources that are subject to Control Techniques Guidelines (CTG) and for major sources of ozone precursors.

Pursuant to the California Environmental Quality Act (CEQA) the MDAQMD has determined that a Categorical Exemption (Class 8 – 14 Cal. Code Reg §15308) applies and has prepared a Notice of Exemption for this action.

9/22

FILED
MOJAVE DESERT AQMD
CLERK OF THE BOARD

SEP 27 2017

BY

PROOF OF PUBLICATION

(2015.5 C.C.P.)

STATE OF CALIFORNIA,
County of San Bernardino

I am a citizen of the United States and a resident of the County aforesaid; I am over the age of eighteen years, and not a party to or interested in the above entitled matter. I am the principal clerk of the publisher of the DAILY PRESS, a newspaper of general circulation, published in the City of Victorville, County of San Bernardino, and which newspaper has been adjudicated a newspaper of general circulation by the Superior Court of the County of San Bernardino, State of California, under the date of November 21, 1938, Case number 43096, that the notice, of which the annexed is a printed copy (set in type not smaller than nonpareil), has been published in each regular and entire issue of said newspaper and not in any supplement thereof on the following dates, to-wit:

September 22

All in the year 2017.

I certify (or declare) under penalty of perjury that the foregoing is true and correct.

Dated this: 22nd **day of** September, 2017

Leslie Jacobs

Signature

Leslie Jacobs

This space is the County Clerk's Filing Stamp

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MOJAVE DESERT AQMD
CLERK OF THE BOARD

SEP 27 2017

BY

Proof of Publication of
NOTICE OF HEARING

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NOTICE IS HEREBY GIVEN that the Governing Board of the Mojave Desert Air Quality Management District (MDAQMD) will conduct a public hearing on October 23, 2017 at 10:00 A.M. to consider the proposed amendment of Rule 102 – *Definition of Terms*, Rule 461 – *Gasoline Transfer and Dispensing, Rule 462 - Organic Liquid Loading*, Rule 463 – *Storage of Organic Liquids*, Rule 1115 – *Metal Parts & Products Coating Operations*, and Rule 1160 – *Internal Combustion Engines*.

SAID HEARING will be conducted in the Governing Board Chambers located at the MDAQMD offices 14306 Park Avenue, Victorville, CA 92392-2310 where all interested persons may be present and be heard. Copies of the proposed rules and the associated Staff Reports are on file and may be obtained from the Executive Office Manager at the MDAQMD Offices. Written comments may be submitted to Brad Poiriez, APCO at the above office address. Written comments should be received no later than October 20, 2017 to be considered. If you have any questions regarding Rule 102 or Rule 1115 you may contact Tracy Walters at (760) 245-1661 extension 6122 for further information. If you have any questions regarding Rules 461, 462, [illegible] for further information. If you have any questions regarding Rule 1160 you may contact Sheri Haggard at extension 1864 for further information. Traducción esta disponible por solicitud.

The proposed amendment of Rule 102 – *Definition of Terms* is necessary to shift common definitions used in the MDAQMD rulebook to Rule 102, and to update them for consistency and clarity.

Rules 461, 462, 463, 1115 and 1160 are proposed for amendment to satisfy 42 U.S.C. §§7511a (Federal Clean Air Act (FCAA) §182) which requires that ozone non-attainment areas implement Reasonably Available Control Technology (RACT) for sources that are subject to Control Techniques Guidelines (CTG) and for major sources of ozone precursors.

Pursuant to the California Environmental Quality Act (CEQA) the MDAQMD has determined that a Categorical Exemption (Class 8 – 14 Cal. Code Reg §15308) applies and has prepared a *Notice of Exemption* for this action.

Published in the
Daily Press
September 22, 2017
(F-95)

Appendix "C"
Public Comments and Responses

1. Metropolitan Water District of Southern California, July 29, 2015. (Supporting documents provided by MWD are included in the Rule archive.)
2. EPA Comments on Mojave Desert Rule 1115 Metal Parts& Products Coating Operations, 08/25/2017
3. Metropolitan Water District of Southern California email, 8/25/2017 Supporting documents provided by MWD are included in the Rule archive.)
4. Metropolitan Water District of Southern California email, October 11, 2017
5. Metropolitan Water District of Southern California email, October 30, 2017
6. EPA comments on MDAQMD Rule 1115, draft dated 11/7/2017, December 19, 2017.

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1. Metropolitan Water District of Southern California, July 29, 2015

THE METROPOLITAN WATER DISTRICT
OF SOUTHERN CALIFORNIA

Office of the General Manager

July 29, 2015

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Bret Banks
Deputy Director Antelope Valley Operations
Mojave Desert Air Quality Management District
14306 Park Avenue
Victorville, California 92392-2310

Dear Mr. Banks:

MDAQMD Notice to Comply 4421, 3M Scotchkote Spray System HSS-450

This correspondence is a follow-up to the July 27, 2015 conversation last week between you and Ms. Carol Kaufman of my staff, regarding Notice to Comply (NTC) 4421, which was issued subsequent to the June 10, 2015 inspection of the Metropolitan Water District of Southern California (Metropolitan), Gene Pumping Plant. The NTC requests compliance verification of the transfer efficiency for the 3M Scotchkote Spray System HSS-450 (Spray System) with MDAQMD Rule 1115, to be followed by applicable permitting.

To address the NTC, in the July 27th discussion you were receptive to reviewing the applicability of the latest South Coast Air Quality Management District (SCAQMD) rulemaking activities for Rule 1107, Coating of Metal Parts and Products. In their 2012 rulemaking, SCAQMD proposed added flexibility to allow other spray equipment options for high viscosity coatings, and recommended that high viscosity coatings be exempt from the transfer efficiency requirements. The 3M Spray System falls under these criteria, as it is dedicated to the application of 3M Liquid Epoxy Coating 323, which is a 100% solids epoxy coating with a VOC content as mixed of 12 g/L. Additionally, in permitting the high viscosity, high solids coating application equipment, SCAQMD has taken the approach of not requiring permits for coating equipment that has VOC emissions of three pounds per day or less or 66 pounds per calendar month or less. Therefore, in alignment with the SCAQMD's approach, we are asking that the 3M Scotchkote 323 Spray System similarly not be subject to the MDAQMD metal parts coating transfer efficiency and permitting requirements.

1

Background

The Spray System utilizes a dual-cartridge setup along with unique application equipment designed specifically to spray apply the 100 % solids epoxy coating, Scotchkote 323. The novel system is designed to improve application efficiency, and can provide high build in one pass up to 45 mils (1150 microns). As compared to standard application methods, this can effectively reduce the need for additional coats up to four times. Attachment 1 is the brochure describing the 3M Scotchkote Spray System HSS-450 Spray System.

In recognition of the Spray System's improved application efficiency combined with the high viscosity and low VOC content of the Scotchkote 323, SCAQMD's proposed and existing rule requirements are as follows below.

Transfer Efficiency:

To date no formal transfer efficiency information has been available from either 3M or the Spray System manufacturer, Plas-Pak Industries. However, the properties of the high viscosity coatings and their application equipment were recognized during the SCAQMD 2012 rulemaking activities to amend Rule 1107. In their July 2012 Proposed Amended Rule (PAR) 1107 (Attachment 2), the following was proposed:

> (f) Exemptions (8) *The provisions of paragraph (c)(1)* shall not apply to metal coatings with a viscosity of 650 centipoise or greater, as applied.*
>
> *(c)(1) refers to approved operating equipment, including HVLP guns, and guns with specific transfer efficiencies.

In further reference to transfer efficiency, the SCAQMD July 2012 PAR 1107 Preliminary Draft Staff Report (page 9) (Attachment 3) states that, "*The options available for coating application equipment will be expanded for high viscosity coatings.* Flexibility will be provided for shops that are able to document that alternative application equipment would reduce emissions beyond HVLP spray technology. Some coating properties such as high solids content may make HVLP spray application impractical without additional thinning. Facilities may submit a plan providing for the District to review and allow other spray techniques where the use of HVLP equipment would result in greater emissions. *Additionally, an exemption will be included for high viscosity coatings.*"

Permitting:

In recognition of the properties of high viscosity coatings, SCAQMD Rule 219, Equipment Not Requiring a Written Permit Pursuant to Regulation II, (l)(6) (Attachment 4), exempts the following:

> "Coating or adhesive application or laminating equipment such as air, airless, air-assisted airless, high volume low pressure (HVLP), air brushes, electrostatic spray equipment, roller coaters, dip coaters, vacuum coaters, flow coaters and spray machines provided that:
>
> > (A) the VOC emissions from such equipment (including clean-up) are three (3) pounds per day or less or 66 pounds per calendar month or less".

Attachments

In support of our request, the following documents are attached:

1. MDAQMD Notice to Comply No. 4421, Dated 7/15/15
2. 3M Scotchkote Spray System HSS-450 Manufacturer Information (14 pages)
3. SCAQMD Preliminary Draft Staff Report for Proposed Amended Rule 1107 – Coating of Metal Parts and Products, Highlighted Text on Pages 2, 9, 14, 37, 56-58 (23 pages)
4. SCAQMD Proposed Amended Rule 1107 – Coating of Metal Parts and Products (21 pages)
5. SCAQMD Rule 219 – Equipment Not Requiring a Written Permit Pursuant to Regulation II (6 pages)

We appreciate your review of our request to resolve the NTC. The Spray System's efficient design, in conjunction with the high viscosity and low VOC content of the Scotchkote 323 coating, merit alignment of the transfer efficiency and permitting requirements with SCAQMD's approach.

If you have any questions or require additional information, please contact Ms. Carol Kaufman at (213) 217-6207.

Very Truly Yours,

Daniel J. Guillory
Manager, Environmental Program Support Team

S:SES corres/Kaufman,Carol/ R-15-64 MDAQMD NTC 4421 MWD Reply7-29-15.doc

Attachments

cc: Mr. Alan De Salvio, Deputy Director Mojave Desert Operations, MDAQMD
Mr. Daniel Concho, Air Quality Specialist, MDAQMD
Ms. Roseana Navarro-Brasington, Air Quality Engineer, MDAQMD

District response to Comment #1

1. Subsections (C)(1)((a)(x) and (D)(7) were added to address transfer efficiency for high viscosity coatings, utilizing proposed SCAQMD Rule 1107 language .

2. EPA Comments on Mojave Desert Rule 1115 Metal Parts & Products Coating Operations, August 25, 2016

Hi Tracy,

We took a look at the preliminary draft of Rule 1115 and have the following comments.

This is in reference to the first draft (D1) of the MDAQMD Rule 1115, Miscellaneous Metal Parts and Products Operations dated 08/04/2017.

1. (C)(2)(a)(i) Coating Limits, Military Specifications: Please fix the typographical error from 34o g/l to 340 g/l.
2. (C)(2)(a)(i) Coating Limits: Please change the Coating Category from "One-Component" to "Prefabricated Architectural One-Component" as is in the corresponding CTG for Miscellaneous Metal Plastic and Parts (EPA 453-R-08-003) Table 2 on page 33.
3. (C)(2)(a)(i) Coating Limits: Please change the Coating Category from "Multi-Component" to "Prefabricated Architectural Multi-Component" as is in the corresponding CTG for Miscellaneous Metal Plastic and Parts (EPA 453-R-08-003) Table 2 on Page 33.

Feel free to give me or Arnie Lazarus (415-072-3024) a call if you want to discuss further. Thanks.

Nicole

Nicole Law
Rules Office, Air Division
U.S. EPA Region 9
75 Hawthorne Street
San Francisco, 94105
Office: (415) 947-4126

District response to Comment #2

1. Typographical error corrected.
2. Coating category title changed as requested.
3. Coating category title changed as requested.

3. Metropolitan Water District of Southern California, August 25, 2017

Hi Tracy,

Thank you for this quick follow-up to our discussion from a couple of weeks ago. You are correct in that SCAQMD did not complete the rulemaking activities back in the 2012 to amend Rule 1107, Metal Parts Coating, due to unresolved issues. However, SCAQMD is currently pursuing rulemaking activities to amend Rule 1168, Adhesives and Sealants, in which they are dealing with the similar issue of transfer efficiencies of application equipment based on the product viscosities. A copy of the most recent SCAQMD Proposed Amended Rule (PAR) 1168 is attached, adoption of which is scheduled in October 2016. In the SCAQMD PAR(i)(14), the amendments are proposing to change the existing allowance "For adhesives and sealants with a viscosity of 200 centipoise or greater to use HVLP, airless spray, air-assisted airless, and air-atomized spray…" equipment, to an exemption from transfer efficiency requirements altogether. **In alignment with this established concept, we ask that MDAQMD also consider providing in Rule 1115 a similar exemption from transfer efficiency requirements for metal coatings with a viscosity of 200 centipoise or greater.** With regards to the 200 centipoise viscosity threshold, in the PAR 1107 and 1168 rulemaking activities, Metropolitan and SCAQMD have had multiple discussions about the viscosities of high solids products relative to transfer efficiency and application methods. For your reference, attached is a table that was originally assembled during the SCAQMD PAR 1107 rulemaking which lists the viscosities of various products and the manufacturer recommended application methods.

We appreciate the opportunity to participate in this rulemaking. Please let me know if you have any questions or require additional information.

Sincerely,

Carol Kaufman
Air Quality Program Manager
Metropolitan Water District of Southern California
700 North Alameda Street
Los Angeles, CA 90012
213-217-6207
FAX 213-217-6700
Cell 310-850-6105

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Table 1, High Solids Product Information

Product Name	Manufacturer	Product Type	Viscosity at Room Temperature (21 ^{o} C) (cps)	VOC (g/L)	Manufacturer Recommended Application Method
1. Raven AquataPoxy A-6, Part A	Raven Linings	100% Solid Epoxy Resin	10,000 - 18,000	0	Heated plural component airless or air-assisted spray
2. Raven AquataPoxy A-6, Part B	Raven Linings	100% Solid Epoxy Resin	80,000 - 140,000	0	Heated plural component airless or air-assisted spray
3. Scotchkote 323, Part A	3M	100% Solid Epoxy Resin	120,000 - 280,000	12	Gun Cartridge or heated plural component pump
4. Scotchkote 323, Part B	3M	100% Solid Epoxy Resin	13,000 – 20,000	12	Gun Cartridge
5. Powercrete J, Part A and B	Berry Plastics Corp	100% Solid Epoxy Resin	65,000	0	Gun Cartridge or heated plural component airless pump
6. Amercoat 133	PPG Ameron	Ultra High Solids Epoxy	1,600 to 4,500	38	Airless
7. Arc S2, Part A	Chesterton	Epoxy Resin	50,000	0	Heated plural component airless
8. Arc S2, Part B	Chesterton	Epoxy Resin	6,000 – 19,000	0	Heated plural component airless
9. Amerlock 2 VOC , Part A	PPG Industries, Inc.	Epoxy Resin	8,000-16,000	84	Airless spray, Conventional spray
10. Amerlock 2 VOC , Part B	PPG Industries, Inc.	Epoxy Resin	4,000-8,000	84	Airless spray, Conventional spray

11. Amershield VOC, Part B	PPG Industries, Inc.	Polyurethane Topcoat	8,000	84	Airless spray, Electrostatic spray, Conventional spray, Air-assisted airless spray
12. Amershield VOC, Part B	PPG Industries, Inc.	Polyurethane Topcoat	No Data (most likely < 10,000)	84	Airless spray, Electrostatic spray, Conventional spray, Air-assisted airless spray
13. Amercoat 68HS VOC, Part A	PPG Industries, Inc.	Epoxy Zinc Primer	1,000-3,000	84	Conventional spray, Airless spray
14. Amercoat 68HS VOC, Part B	PPG Industries, Inc.	Epoxy Zinc Primer	54-70	84	Conventional spray, Airless spray

District response to Comment #3

1. The District appreciates the input on high viscosity substances currently available to industry and notes that all but one of the listed substances qualifies for the transfer efficiency exemption in the proposed rule. The District will update this rule and others as needed to remain consistent with similar coating rules adopted elsewhere in the state, after those similar rules are found to meet Reasonably Available Control Technology.

4. Metropolitan Water District of Southern California, October 11, 2017

Tracy Walters

From: Kaufman,Carol Y <cykaufman@mwdh2o.com>
Sent: Wednesday, October 11, 2017 5:49 PM
To: Tracy Walters
Cc: Alan De Salvio; Wallace,Johnny; Cotter,Sean T; Fang,Anthony C; Bell,Janet J
Subject: MWD Comments -- MDAQMD Rule 1115 - Metal Parts & Products Coating Operations
Attachments: MD 1115 Staff Report D1.pdf

Importance: High

Hi Ms. Walters,

We appreciate the productive dialog that we have had with MDAQMD during the rulemaking activities to amend Rule 1115. The proposed revisions that recognize the viscosities of high solids coating products relative to transfer efficiency and application methods will be beneficial in allowing the proper manufacturer prescribed equipment to be used to apply high solids-low VOC products. As discussed on Tuesday, Metropolitan would like to provide additional comments to facilitate any needed transition to the lower VOC materials.

1 → As currently proposed, the reduced Coating VOC limits listed in (C)(2) do not have a specified effective date. To formally provide users with reasonable time to switch to the newly reduced VOC products, we suggest that ***effective dates be provided for the new VOC limits***. This approach is similar to that already provided in the MDAQMD existing Rule 1113, Architectural Coatings. Rule 1113 also contains a ***"Sell-Through of Coatings"*** provision, (C)(5); inclusion of a similar language in Rule 1115 would be beneficial.

> (5) Sell-Through of Coatings
>
> (a) A Coating listed in Table 1 or Table 2 and manufactured prior to January 1, 2013 effective date may be sold, supplied, or offered for sale for up to three years after the January 1, 2013, so long as the Coating complied with the standards in effect at the time the Coating was manufactured. A Coating listed in Table 1 or Table 2 and manufactured before the January 1, 2013effective date may be applied at any time, both before and after January 1, 2013, so long as the Coating complied with the standards in effect at the time the Coating was manufactured. This subsection does not apply to any Coating that does not display the date or date-code required by subsection (D)(1)(a).

Thank you for your consideration of these recommendations. Please let me know if you have any questions or would like to discuss further.

Best Regards,

Carol Kaufman
Air Quality Program Manager
Metropolitan Water District of Southern California
700 North Alameda Street
Los Angeles, CA 90012

1

213-217-6207
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Cell 310-850-6105

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District response to Comment #4

1. Former subsection (C)(2)(b) was modified to new subsection (C)(3) – Sell-Through and Use of Coatings. Since there are only two coatings proposed with lower limits, General and Military Specification, these were given a 1 year additional compliance date of approximately January 31, 2019 (about 1 year after the rule amendment).

5. Metropolitan Water District of Southern California, October 30, 2017

Tracy Walters

From: Kaufman,Carol Y <cykaufman@mwdh2o.com>
Sent: Thursday, November 30, 2017 3:55 PM
To: Tracy Walters
Cc: Cotter,Sean T; Fang,Anthony C; Bell,Janet J; Gabelich,Christopher J
Subject: MWD Comments -- MDAQMD Proposed Amendments to Rule 1115

Hi Tracy,

We appreciate the opportunity to continue working with MDAQMD staff on Rule 1115, Metal Parts Coating. As we have discussed, we are asking that MDAQMD consider the inclusion of a provision specifically for the use of highly specialized electric-insulating and thermally-conducting coatings. These types of coatings are used during maintenance and repair of the main armatures at Metropolitan's desert pump plants, and on electrical connections, rotor windings, oil reservoirs, rotors, and stators. Historically very low quantities of these types of coatings have been used – during the last two years, Metropolitan's use at each of our pump plants has been approximately two gallons or less per facility (Iron Mountain, Gene, and Intake Pump Plants within the MDAQMD jurisdiction).

As discussed, SCAQMD Rule 1107, Coating of Metal Parts and Products, currently has the following provisions related to this type of specialized performance coating:

1 →

(b) Definitions

(12) ELECTRIC-INSULATING AND THERMAL-CONDUCTING COATING is a coating that displays an electrical insulation of at least 1000 volts DC per mil on a flat test plate and an average thermal conductivity of at least 0.27 BTU per hour-foot-degree-Fahrenheit.

(f) Exemptions

(1) The provisions of paragraphs (c)(1) and (c)(2) of this rule shall not apply to:

(E) Electric-insulating and thermal-conducting coatings.

Thank you for your consideration of this request. Please contact me if you have any questions or require additional information.

Sincerely,

Carol Kaufman
Air Quality Program Manager
Metropolitan Water District of Southern California
700 North Alameda Street
Los Angeles, CA 90012
213-217-6207
FAX 213-217-6700
Cell 310-850-6105

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District response to Comment #5

1. Definition and exemption have been added for consistency between district rules. This will reduce confusion for facilities using the same product in adjoining districts. This is an extremely low use coating.

6. EPA comments on MDAQMD Rule 1115, December 19, 2017

Tracy Walters

From: Law, Nicole <Law.Nicole@epa.gov>
Sent: Tuesday, December 19, 2017 11:55 AM
To: Tracy Walters; Alan De Salvio
Cc: Lo, Doris; Bushey, Douglas
Subject: EPA comments on MDAQMD Rule 1115, draft dated 11/7/2017

Hi Alan and Tracy,

Thanks for the phone call yesterday regarding our comments on MDAQMD Rule 1115, dated 11/7/2017. Here are our comments.

1. Section (C)(1)(a) contains an "or" following section (viii). However, section (viii) is no longer the penultimate item on the list and we suggest moving or removing the "or."
2. Section (C)(1)(a)(ix) provides an alternative to the required application methods, but does not require demonstration that the alternative's transfer efficiency is at least equal to or better than HVLP spraying. Make this alternative enforceable by replacing the word "recommended" in the final paragraph of the rule (section (G)(3) of this draft of the rule) with the word "required."
3. Section (C)(1)(a)(x) does not specify how a demonstration is made and contains director's discretion. Please either bound this discretion, or add a requirement for CARB and EPA approval of the equipment.
4. Section (C)(1)(a)(x) also contains a typographical error. The word "listen" should be "listed."
5. Section (C)(5)(b) contains the word "or" between some but not all items. This section should be reorganized to clarify which items are options and which are requirements.
6. Section (C)(5)(b)(vi) contains director's discretion. Please either bound this discretion, or add a requirement for CARB and EPA approval.
7. Section (F)(1)(a) should include a references to Section (D)(5) in addition to (D)(2), (D)(3)(a), and (D)(3)(b).
8. The last paragraph is currently numbered (G)(3) but should be renumbered to (G)(4). Also, the reference to section (C)(1)(a)(v) should be replaced with (C)(1)(a)(ix).

If you have any further comments, please feel free to give me a call. Happy Holidays!

Nicole

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Office: (415) 947-4126

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District response to Comment #6

1. Moved “or” to subsequent section as requested.
2. Replaced “recommended” with “required” as requested.
3. CARB and EPA added as requested.
4. Typographical error corrected as noted.
5. This section has been reorganized for clarity as requested.
6. CARB and EPA added as requested.
7. Reference to subsection (D)(5) added as requested.
8. Paragraph has been renumbered and cross reference updated as requested.

Appendix "D"

California Environmental Quality Act
Documentation

1. Notice of Exemption – San Bernardino County
2. Notice of Exemption – Riverside County

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Mojave Desert Air Quality Management District
14306 Park Avenue, Victorville, CA 92392-2310
760.245.1661 • fax 760.245.2699
Visit our web site: http://www.mdaqmd.ca.gov
Brad Poiriez, Executive Director

DATE FILED & POSTED
Posted On: 01/29/18
Removed On: 03/13/18
Receipt No: 36-01292018-050

NOTICE OF EXEMPTION

TO: County Clerk
San Bernardino County
385 N. Arrowhead, 2nd Floor
San Bernardino, CA 92415

FROM: Mojave Desert
Air Quality Management District
14306 Park Ave
Victorville, CA 92392-2310

X MDAQMD Clerk of the Governing Board

PROJECT TITLE: Amendment of Rule 1115 – Metal Parts & Products Coating Operations.

PROJECT LOCATION – SPECIFIC: San Bernardino County portion of the Mojave Desert Air Basin and Palo Verde Valley portion of Riverside County.

PROJECT LOCATION – COUNTY: San Bernardino and Riverside Counties

DESCRIPTION OF PROJECT: The proposed amendment of Rule 1115 – *Metal Parts & Products Coating Operations* will satisfy 42 U.S.C. §§7511a (Federal Clean Air Act (FCAA) §182) which requires that ozone non-attainment areas implement Reasonably Available Control Technology (RACT) for sources that are subject to Control Techniques Guidelines (CTG) documents issued by United States Environmental Protection Agency (USEPA) for "major sources" of Volatile Organic Compounds (VOCs) and oxides of nitrogen (NO_X) which are ozone precursors. The proposed amendment of Rule 1115 also satisfies the provisions of former Health & Safety Code (H&S Code) §39614(d) (expired by its own terms on January 1, 2011) which requires the adoption of certain control measures for Particulate Matter (PM) from a list promulgated by the California Air Resources Board (CARB).

2018 JAN 29 PM 4:31
CLERK OF THE BOARD OF SUPERVISORS
COUNTY OF SAN BERNARDINO
CALIFORNIA

NAME OF PUBLIC AGENCY APPROVING PROJECT: Mojave Desert AQMD

NAME OF PERSON OR AGENCY CARRYING OUT PROJECT: Mojave Desert AQMD

EXEMPT STATUS (CHECK ONE)
Ministerial (Pub. Res. Code §21080(b)(1); 14 Cal Code Reg. §15268)
Emergency Project (Pub. Res. Code §21080(b)(4); 14 Cal Code Reg. §15269(b))
X Categorical Exemption – Class 8 (14 Cal Code Reg. §15308)

REASONS WHY PROJECT IS EXEMPT: The proposed amendments to Rule 1115 are exempt from CEQA review because the amendments will not create any adverse impacts on the environment. The proposed rule amendments are more stringent than the previous rule version. Because there is no potential that the amendments might cause the release of additional air contaminants or create any adverse environmental impacts, a Class 8 categorical exemption (14 Cal. Code Reg. §15308) applies.

LEAD AGENCY CONTACT PERSON: Brad Poiriez **PHONE:** (760) 245-1661

SIGNATURE: _____ **TITLE:** Executive Director **DATE:** January 22, 2018

DATE RECEIVED FOR FILING:

City of Adelanto | Town of Apple Valley | City of Barstow | City of Blythe | City of Hesperia | City of Needles | County of Riverside | County of San Bernardino | City of Twentynine Palms | City of Victorville | Town of Yucca Valley

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County of Riverside
Peter Aldana
Assessor-County Clerk-Recorder
E-201800087
01/31/2018 01:33 PM Fee: $ 50.00
Page 1 of 1
Removed: By: Deputy

MOJAVE DESERT air quality management district

Mojave Desert Air (
MOJAVE DESERT AQMD 14306 Par
CLERK OF THE BOARD

FEB 05 2018

BY

Brad Poiriez, Executive Director

NOTICE OF EXEMPTION

TO: Clerk/Recorder
Riverside County
3470 12th St.
Riverside, CA 92501

FROM: Mojave Desert
Air Quality Management District
14306 Park Ave
Victorville, CA 92392-2310

X MDAQMD Clerk of the Governing Board

PROJECT TITLE: Amendment of Rule 1115 – Metal Parts & Products Coating Operations.

PROJECT LOCATION – SPECIFIC: San Bernardino County portion of the Mojave Desert Air Basin and Palo Verde Valley portion of Riverside County.

PROJECT LOCATION – COUNTY: San Bernardino and Riverside Counties

DESCRIPTION OF PROJECT: The proposed amendment of Rule 1115 – *Metal Parts & Products Coating Operations* will satisfy 42 U.S.C. §§7511a (Federal Clean Air Act (FCAA) §182) which requires that ozone non-attainment areas implement Reasonably Available Control Technology (RACT) for sources that are subject to Control Techniques Guidelines (CTG) documents issued by United States Environmental Protection Agency (USEPA) for "major sources" of Volatile Organic Compounds (VOCs) and oxides of nitrogen (NO_X) which are ozone precursors. The proposed amendment of Rule 1115 also satisfies the provisions of former Health & Safety Code (H&S Code) §39614(d) (expired by its own terms on January 1, 2011) which requires the adoption of certain control measures for Particulate Matter (PM) from a list promulgated by the California Air Resources Board (CARB).

NAME OF PUBLIC AGENCY APPROVING PROJECT: Mojave Desert AQMD

NAME OF PERSON OR AGENCY CARRYING OUT PROJECT: Mojave Desert AQMD

EXEMPT STATUS (CHECK ONE)

Ministerial (Pub. Res. Code §21080(b)(1); 14 Cal Code Reg. §15268)
Emergency Project (Pub. Res. Code §21080(b)(4); 14 Cal Code Reg. §15269(b))
X Categorical Exemption – Class 8 (14 Cal Code Reg. §15308)

REASONS WHY PROJECT IS EXEMPT: The proposed amendments to Rule 1115 are exempt from CEQA review because the amendments will not create any adverse impacts on the environment. The proposed rule amendments are more stringent than the previous rule version. Because there is no potential that the amendments might cause the release of additional air contaminants or create any adverse environmental impacts, a Class 8 categorical exemption (14 Cal. Code Reg. §15308) applies.

LEAD AGENCY CONTACT PERSON: Brad Poiriez **PHONE:** (760) 245-1661

SIGNATURE: **TITLE:** Executive Director **DATE:** January 22, 2018

DATE RECEIVED FOR FILING:

City of Adelanto | Town of Apple Valley | City of Barstow | City of Blythe | City of Hesperia | City of Needles | County of Riverside | County of San Bernardino | City of Twentynine Palms | City of Victorville | Town of Yucca Valley

Appendix "E"
Bibliography

The following documents were consulted in the preparation of this staff report.

1. *Control Techniques Guidelines for Miscellaneous Metal and Plastic Parts Coatings* (EPA-453/R-08-003, September 2008)
2. *Control of Volatile Organic Emissions From Existing Stationary Sources Volume VI: Surface Coating of Miscellaneous Metal Parts and Products* (EPA-450/2-78-015, June 1978)
3. *Control Techniques Guidelines: Industrial Cleaning Solvents* (EPA 453/R-06-001, September 2006*)*
4. *Control Techniques Guidelines for Large Appliance Coatings (*EPA 453/R-07-004, September 2007)
5. *Control Techniques Guidelines for Metal Furniture Coatings* (EPA 453/R-07-005, September 2007)
6. Monterey Bay Unified Air Pollution Control District Rule 434 – *Coating of Metal Parts and Products,* amended 01/17/2001 (66 FR 50319, 10/31/2001)
7. Bay Area Air Quality Management District Rule 8-19 – *Surface Preparation and Coating of Miscellaneous Metal Parts and Products*, amended 10/16/2002 (69 FR 62588, 10/27/2004)
8. San Diego Air Pollution Control District Rule 67.3 – *Metal Parts and Products Coating Operations*, amended 04/09/2003 (68 FR 64538. 11/14/03)
9. South Coast Air Quality Management District Rule 1107 – *Coating of Metal Parts and Products*, amended 01/06/2006 (73 FR 70883, 11/24/2008)
10. Ventura County Air Pollution Control District Rule 74.12 – *Surface Coating of Metal Parts and Products*, amended 04/08/2008 (76 FR 30025, 5/24/2011)
11. Placer County Air Pollution Control District Rule 245 – *Surface Coating of Metal Parts and Products*, amended 08/20/2009 (76 FR 30025, 5/24/2011)
12. San Joaquin Valley Unified Air Pollution Control District Rule 4603 – *Surface Coating of Metal Parts and Products, Plastic Parts and Products, and Pleasure Crafts*, amended 09/17/2009 (76 FR 67369, 11/01/2011)
13. Sacramento Metropolitan Air Quality Management District Rule 451 – *Surface Coating of Miscellaneous Metal Parts and Products*, amended 09/25/2008 (76 FR 71886, 11/21/2011)
14. MDAQMD List and Implementation Schedule for District Measures to Reduce PM Pursuant to Health and Safety Code §39614(d), adopted June 27, 2005.

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